



RESTRUCTURING PAPER
ON A
PROPOSED PROJECT RESTRUCTURING
OF
COMOROS SOCIAL SAFETY NET PROJECT
APPROVED ON MARCH 19, 2015
TO
UNION OF COMOROS

SOCIAL PROTECTION & LABOR

AFRICA

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ABBREVIATIONS AND ACRONYMS

ANACE P	National Agency for the Design and Implementation of Projects (<i>Agence Nationale de Conception et D'Execution des Projets</i>)
FADC	Community Development Support Fund (<i>Fonds d'Appui au Développement Communautaire</i>)
GoC	Government of the Union of Comoros
SSN	Social Safety Net



BASIC DATA

Product Information

Project ID P150754	Financing Instrument Investment Project Financing
Original EA Category Partial Assessment (B)	Current EA Category Partial Assessment (B)
Approval Date 19-Mar-2015	Current Closing Date 30-Jun-2019

Organizations

Borrower Union of Comoros	Responsible Agency ANACEP
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Project Development Objective (PDO)

Original PDO

The Project Development Objective is to increase poor communities' access to safety net and nutrition services.

Summary Status of Financing

Ln/Cr/Tf	Approval	Signing	Effectiveness	Closing	Net Commitment	Disbursed	Undisbursed
IDA-D0320	19-Mar-2015	09-Apr-2015	02-Jul-2015	30-Jun-2019	6.00	5.44	.45

Policy Waiver(s)

Does this restructuring trigger the need for any policy waiver(s)?

No



I. PROJECT STATUS AND RATIONALE FOR RESTRUCTURING

1. **The Comoros Social Safety Net Project** was approved on March 19, 2015 and became effective on July 2, 2015. The Project's development objective is to *increase poor communities' access to safety net and nutrition services*. To this end, the project was designed to support three essential elements of a safety net system:

- Component 1 would establish a Productive and Disaster Responsive Safety Net (US\$4 million). It includes the sub-component 1.1 to establish a Productive Safety Net, and sub-component 1.2 to ensure an Early Recovery Response to Natural Disasters.
- Component 2 would improve the Nutrition of Young Children and Mothers from Poor Communities (US\$1 million).
- Component 3 would strengthen Safety Net Management, Coordination, and Monitoring and Evaluation (US\$1 million).

The project's closing date is June 30, 2019.

2. **Project implementation has largely proceeded as planned** and is overall rated as moderately satisfactory. Since March 2017, the Project has, however, suffered some delays due to the institutional changes introduced by the newly elected government. During the project's Mid Term Review in July 2018, the Government and the Bank agreed to restructure the project.

Rationale for Restructuring

3. **This Restructuring Paper seeks your approval for a Level 2 Restructuring** of the Comoros Social Safety Net (SSN) Project based on a request by the Government of the Comoros (GoC) dated June 25, 2018 to reinforce the nutrition activities and to end the other activities of the project, namely the safety net activities. In response to this request, this paper is submitted to (i) adjust some targets of selected indicators, (ii) reallocate funding between categories, (iii) account for the institutional changes, and (iv) add a subcomponent 2.2 to intensify the capacity building, monitoring and communication of the community-based nutrition service.



II. DESCRIPTION OF PROPOSED CHANGES

The restructuring addresses four aspects of project implementation.

4. **Results Framework.** The changes in the results framework are related to adjustments of some of the targets of indicators, not the indicators per se. Under Component 1, the project included funding for disaster response through cash for work activities. Fortunately, Comoros has not suffered from disasters during the project implementation period as it had during the previous years. Therefore, the target beneficiary numbers need to be downsized. This concerns mainly the indicators that are related to the number of safety net beneficiaries since the original targets included provisions for disaster related cash for work activities nationwide. On the other hand, the number of beneficiaries profiting from the nutrition services had been underestimated and is now being adjusted to reflect more realistic numbers.

5. **Reallocation between components and categories.** Based on the Government's request, all safety net activities are being ended by January 2019, five months prior to the plan and the project's closing date. This implies the reallocation of funds from the sub-component 1.1 (productive safety net) and 1.2 (disaster response) to component 2 (nutrition), as well as to component 3 (management, coordination and M&E) to account for the additional activities related to nutrition and the higher management costs of the project due to the institutional changes.

6. **Institutional arrangements.** Through a Presidential Decree (No. 17-29 dated March 18, 2017) the Government created the new entity ANACEP (National Agency for Design and Implementation of Projects, *Agence Nationale de Conception et d'Exécution des Projets*) whose objective it is to prepare, coordinate and monitor all investment and development projects in the country. The Decree also dissolved the project's implementing agency FADC (Community Development Support Fund, *Fonds d'Appui au Développement Communautaire*) (Chapter V of the Decree). During the supervision mission of the Project in July 2018, the GOC decided to keep the Social Safety Net Project under ANACEP. The entire project implementation team of FADC, except for its Executive Director, was moved to ANACEP which is headed by a Director General. The Bank carried out an institutional assessment of the arrangements, with a focus on operational, fiduciary and safeguard capacities, and found that they continue to be adequate given that the entire FADC staff was moved to the new institution and that they continue to work on the project. To reflect this institutional change, the Project's legal agreements need to be adjusted accordingly.

7. **Components.** A subcomponent 2.4 is added for *intensifying the capacity building, monitoring and communication of the community-based nutrition services* under Component 2. Sub-component 2.1 will continue to be implemented by UNICEF, while sub-component 2.4 will be implemented by the Ministry of Health and Solidarity (MoH&S) for the technical work, and the SSN team under ANACEP for fiduciary and safeguards aspects. Due to the intensive capacity building activities for the MoH&S by UNICEF under this project, the Bank team has assessed that the Ministry and ANACEP now have the necessary technical and fiduciary capacity to take on some of these activities. While the original component 2 continues to focus on establishing preventive, community-based nutrition services, the new subcomponent 2.4 enhances communication, quality control and coordination between the community health services and the social protection activities.



Note to Task Teams: The following sections are system generated and can only be edited online in the Portal.

III. SUMMARY OF CHANGES

	Changed	Not Changed
Results Framework	✓	
Components and Cost	✓	
Reallocation between Disbursement Categories	✓	
Institutional Arrangements	✓	
Implementing Agency		✓
DDO Status		✓
Project's Development Objectives		✓
Loan Closing Date(s)		✓
Cancellations Proposed		✓
Disbursements Arrangements		✓
Disbursement Estimates		✓
Overall Risk Rating		✓
Safeguard Policies Triggered		✓
EA category		✓
Legal Covenants		✓
Financial Management		✓
Procurement		✓
Implementation Schedule		✓
Other Change(s)		✓
Economic and Financial Analysis		✓
Technical Analysis		✓
Social Analysis		✓
Environmental Analysis		✓



IV. DETAILED CHANGE(S)

COMPONENTS

Current Component Name	Current Cost (US\$M)	Action	Proposed Component Name	Proposed Cost (US\$M)
Component 1: Establishing a Productive and Disaster Responsive Safety Net	4.00	Revised	Component 1: Establishing a Productive and Disaster Responsive Safety Net	3.43
Component 2: Improving the Nutrition of Young Children and Mothers from Poor Communities	1.00	Revised	Component 2: Improving the Nutrition of Young Children and Mothers from Poor Communities	1.17
Component 3: Strengthening Safety Net Management, Coordination, and Monitoring and Evaluation	1.00	Revised	Component 3: Strengthening Safety Net Management, Coordination, and Monitoring and Evaluation	1.40
TOTAL	6.00			6.00

REALLOCATION BETWEEN DISBURSEMENT CATEGORIES

Current Allocation	Actuals + Committed	Proposed Allocation	Financing % (Type Total)	
			Current	Proposed
IDA-D0320-001 Currency: XDR				
iLap Category Sequence No: 1	Current Expenditure Category: GDS,WKS,TRN,NON-CS,CS,OP			
700,000.00	804,900.99	986,600.00	100.00	100.00
iLap Category Sequence No: 2	Current Expenditure Category: CONSULTING SERVICES - PRT 2 OF PROJ			
700,000.00	752,434.66	824,600.00	100.00	100.00
iLap Category Sequence No: 3	Current Expenditure Category: SUBPROJ - PRT 1 OF PROJ			
2,800,000.00	1,694,514.47	2,388,800.00	100.00	100.00



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Comoros Social Safety Net Project (P150754)

Total	4,200,000.00	3,251,850.12	4,200,000.00
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Results framework

COUNTRY: Comoros

Comoros Social Safety Net Project

Project Development Objectives(s)

The Project Development Objective is to increase poor communities' access to safety net and nutrition services.

Project Development Objective Indicators by Objectives/ Outcomes

Indicator Name	DLI	Baseline	Intermediate Targets				End Target
			1	2	3	4	
Beneficiaries of Safety nets Programs (Action: This Objective is New)							
Beneficiaries of Safety Nets programs (number) (CRI, Number)	0.00		2,000.00	4,500.00	5,000.00	4,000.00	4,000.00
Beneficiaries of Safety Nets programs - Female (number) (Number)	0.00		1,000.00	2,250.00	2,500.00	2,000.00	2,000.00
Beneficiaries of Safety Nets programs - Cash-for-work, food-for-work and public works (number) (Number)	0.00		2,000.00	4,500.00	5,000.00	4,000.00	4,000.00
Number of poor communities that have access to safety net and nutrition services. (Number)	0.00		20.00	60.00	60.00	60.00	60.00
Pregnant/lactating women, adolescent girls and/or children under age five-	0.00		2,000.00	9,600.00	9,600.00	9,600.00	9,600.00



Indicator Name	DLI	Baseline	Intermediate Targets				End Target
			1	2	3	4	
reached by basic nutrition services (number) (Number)							
Children under the age of 24 months benefiting from improved infant and young child feeding (IYCF) practices (number) (Number)		0.00	560.00	2,800.00	2,800.00	2,800.00	2,800.00

Intermediate Results Indicators by Components

Indicator Name	DLI	Baseline	Intermediate Targets				End Target
			1	2	3	4	
Establishing a Productive and Disaster Responsive Safety Net (Action: This Component is New)							
Number of rehabilitated, reconstructed and constructed infrastructure sub-projects (Number)		0.00	0.00	5.00	10.00	10.00	6.00
Number of person/days of employment created (Number)		0.00	90,000.00	330,000.00	570,000.00	600,000.00	600,000.00
Number of households benefiting from post-disaster activities (Number)		0.00	0.00	500.00	1,000.00	1,000.00	0.00
Improving the Nutrition of Young Children and Mothers from Poor (Action: This Component is New)							



Indicator Name	DLI	Baseline	Intermediate Targets				End Target
			1	2	3	4	
Number of children under five years enrolled in the growth monitoring program (Number)		0.00	2,000.00	9,200.00	9,200.00	9,200.00	9,200.00
Number of Community Health Workers trained to provide IYCF services (Number)		0.00	50.00	100.00	100.00	100.00	105.00
Strengthening Safety Net Management, Coordination, and Monitoring and (Action: This Component is New)							
Operational costs of FADC (Percentage)		20.00	20.00	20.00	20.00	20.00	20.00
Number of Operational Audits implemented (Number)		0.00	1.00		1.00		2.00
Percentage of beneficiary households of the Productive Safety Net activities registered in FADC's MIS (Percentage)		0.00	50.00	70.00	80.00	90.00	90.00



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