1. Project Data

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Original Commitment: 400,000,000.00
Revised Commitment: 361,391,511.03
Actual: 332,555,052.86

Prepared by: Judith Hahn Gaubatz
Reviewed by: Salim J. Habayeb
ICR Review Coordinator: Joy Behrens
Group: IEGHC (Unit 2)

2. Project Objectives and Components

a. Objectives

According to the Financing Agreement (page 5), the project objectives were as follows: **To raise school participation by improving sector governance and accountability and strengthening administrative systems, and measure student achievement.** The statements of objectives in the Project Appraisal Document (PAD) and Implementation Completion and Results Report (ICR) were identical to that in the Financing Agreement.
The PDO remained the same throughout the project period. Several key project indicators were revised to improve measurability and accuracy, and some targets were also revised upward due to expanded project scope; therefore, a split evaluation is not considered applicable for purposes of this ICR Review.

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

Did the Board approve the revised objectives/key associated outcome targets?
No

c. Will a split evaluation be undertaken?
No

d. Components
The project supported the implementation of the government's Sindh Education Reform Program II (SERP-II) over the period 2013-17, through two components. (Note: Component amounts represent Bank Credit amounts, not total program costs).

1. Results based Component (Appraisal: US$ 393.0 million; Actual: US$ 313.2 million): This component supported ten initiatives that addressed gaps in and/or current poor practices in sector management and governance. The release of project disbursements was contingent on the satisfactory achievement of Disbursement-Linked Indicators (DLIs) in these ten areas:

   - **Program budget and expenditure management**: Preparation of sound budgets for primary and secondary education and SERP-II initiatives and ensuring that budgetary releases and expenditures are made in full and on a timely basis.
   - **Annual School Census (ASC)**: Administration of the ASC for government schools on a regular basis, accompanied by strengthened administrative procedures, procedures, and practices, and web-based direct reporting by secondary and higher secondary schools.
   - **Student Achievement Test (SAT)**: Administration of the SAT on a regular basis, accompanied by third-party review to strengthen the reliability and validity of the test results and the responsible use and dissemination of test results.
   - **School budgets**: Preparation of school budgets, following transparent, objective, and needs-based criteria; and third-party support to the districts for managing and monitoring the flow and use of school budgets.
   - **School Management Committees (SMCs)**: Stronger due diligence and financial management controls; improved communication of expectations, roles, responsibilities, and redressal avenues to all key parties.
   - **School system consolidation**: Merging of distinct government schools that share the same building, same compound, or are in close proximity and cater to the same local child population into single schools.
   - **School infrastructure development**: Investments in (i) the whole school development of schools with infrastructure deficiencies, (ii) upgrading of primary schools to elementary schools, and (iii) consolidated schools.
• Incentive- and accountability-based public financing of the private provision of schooling:
  Incremental expansion of the public-private rural schooling program.
• Education management: Appointment of specialized cadres of education managers and school
  headmasters; contracts with performance terms and conditions; induction training, job guidelines,
  management materials and tools.
• Teacher management: Strengthened merit- and needs-based teacher recruitment arrangements,
  procedures, and practices; teacher contracts with performance terms and conditions; induction
  training, job guidelines, teaching materials and tools.

2. TA Component (Appraisal: $US 7.0 million; Actual: US$ 6.9 million): Funds were to finance important
   technical, advisory, and capacity-building support to strengthen fiduciary, environmental management,
   administrative, and monitoring and evaluation activities. The selected activities aided program
   implementation and performance including the achievement of DLIs.

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

Project cost

• The entire sector program was appraised at US$ 2,700.0 million, of which the Bank was to provide
  US$400.0 million. The total amount was later revised to US$ 4,821.9 million total, due to increased
  government budget.
• The actual sector program cost during the project period was US$ 4,793.0 million.

Financing

• The project was financed by an IDA Credit of US$400.0 million, of which US$ 332.6 million
  disbursed.
• US$38.0 million of the IDA Credit was cancelled due to unmet DLI targets and also uncommitted
  amounts for technical assistance.

Borrower contribution

• The Borrower's sector reform program expenditures were estimated at US$ 2,300.0 million at
  appraisal, with actual expenditures of US$ 4,460.5 million.

Dates

• March 2013: The project was approved by the Board.
• March 2014: The project became effective.
• June 2017: The project was restructured to adjust the scope of project activities and to revise the
  results framework's indicators and targets. The project closing date was extended from June 2017
  to December 2018 to allow for completion of activities.
• December 2018: The project closed, with US$38.0 million in the IDA Credit cancelled due to three
  unmet DLI targets and also uncommitted amounts for technical assistance.
3. Relevance of Objectives

Rationale

As reported in the PAD (page 1), the level of school participation in Pakistan was low in absolute terms, compared to the rest of the region and other countries at a similar per capita income level. In 2010/11, school participation rates for children in Sindh province ages 6-10 and 11-15 years were 63% and 61%, respectively. The percentage of children in these age brackets never attending school (36% and 28%) rather than dropping out of school (1% and 11%), despite close proximity to schools and no direct schooling costs, strongly suggested that parents from poor households, and parents of girls in rural areas especially, were opting not to send their children to school from the outset. Less than average scores on student achievement tests also indicate low quality of education, which further contributed to the low demand. The low quality of education, provided mostly by the public sector, was attributed to low management capacity, limited accountability, and system capture by special interest groups.

Given the above, the central government adopted a policy of free and compulsory education, with the intent to raise levels of school participation. The provincial government of Sindh also launched a medium term reform program for primary and secondary education (Sindh Education Sector Reform Program, 2007/08), which aimed to maximize gains from current levels of expenditures by improving governance and accountability, rather than by increasing inputs. The Bank provided support to this program through two Bank operations 2007-2012, including through a results-based approach in which disbursements were linked to implementation progress and performance targets. The updated government program - the Sindh Education Sector Plan for 2014-18 - continued to highlight improved quality of education service delivery. This project continued that approach, while also refining and deepening the areas of reforms. The Bank's Country Partnership Strategy for FY2015-19 noted that the Bank would focus on "improving access, quality, and learning outcomes at primary and secondary levels," with increased gross enrollment at primary schools, conducting of annual student achievement tests, and positive trends in learning outcomes as key outcomes to be monitored, although this project did not explicitly focus on improving learning outcomes.

Rating

High

4. Achievement of Objectives (Efficacy)

OBJECTIVE 1
Objective
Raise school participation

Rationale
School participation was initially defined by the project as net enrollment rates, according to results from the Social and Living Standards Measurement household-level surveys; it was later defined by school participation rate by age, regardless of the grade level of enrollment (to account for prevalence of late-age entry and inaccuracies in age reporting in surveys) alongside retention rates and transition rates (to account for incomplete data, drop outs, and the ongoing trend of students shifting from public schools to private schools).

The theory of change for this objective was built on the understanding that low participation in schooling stemmed from low household demand due to low quality of service delivery. Therefore, the activities aimed to improve service delivery, thus addressing demand and increasing participation. The project included a set of critical governance and management reforms to address the issues of underperformance of service delivery at the provincial education offices and schools. Activities to improve service delivery included more timely budgeting and financial flows (from sector level to individual schools); improved sector and teacher management; improved school management and accountability; more efficient use of and higher quality school infrastructure; and outreach to underserved communities. It was plausible that improvements in all these areas would lead to increased demand for and participation in education (with an estimated 8.5 million students benefitting from project interventions).

**Outputs/Disbursement-Linked Indicators (DLIs):**

- **Program budget and expenditure management:** As there were no actual outputs for this DLI, the project team provided documentation to confirm that the conditions for disbursement (the government approved annual budgets, released funds in timely manner, and made payments against approved expenditures) were met.
- **Annual School Census (ASC):** Five rounds of the ASC were conducted.
- **Student Achievement Test (SAT):** Six rounds of SATs were conducted for mathematics, science, and language subjects in government schools across all districts in Sindh between academic years 2012/13 to 2017/18, with the last round involving participation of 319,000 students in 6,030 public schools.
- **School budgets:** As there were no actual outputs for this DLI, the project team provided documentation to confirm that the conditions for disbursement (districts prepared school-specific budgets using needs-based criteria, funds were released per schedule, and there was a review of compliance of non-salary expenditures).
- **School Management Committees (SMCs):** Grants were provided to school management committees at 33,493 government schools.
- **School system consolidation:** Single schools were consolidated into 1,350 campus schools, falling short of the target of 1,500, enabling more efficient resource utilization and teacher rationalization.
- **School infrastructure development:** Needs-based infrastructure was provided to 284 schools, including 908 classrooms, 1,566 washrooms, and 316 water filters.
- **Incentive- and accountability-based public financing of the private provision of schooling:** Support provided to 804 rural schools through public-private partnerships (of which 565 were newly established) in 18 educationally disadvantaged districts; introduction of quality assurance and accountability framework.
• **Education management**: Filling of 6,299 head teacher positions and recruitment of 957 head teachers through a new competitive mechanism, addressing leadership and management gaps in schools; development of performance indicators to track head teacher performance.

• **Teacher management**: Training of 18,032 additional teachers at the primary level, falling short of the target of 24,000, in the areas of lesson planning, teaching methodology, and pedagogical content.

• **Basic quality standard schools** (added at project restructuring): Upgrading of 1,366 schools to meet basic quality standards (including adequate teachers, textbooks and learning materials, classrooms, and furniture), falling short of the target of 2,500, including the construction and/or rehabilitation of 1,808 primary classrooms, which fell short of the target of 2,400.

### Outcomes

#### Increased school participation

• The primary level school participation rate (SPR) (ages 6-10 years) increased from 65.1% in 2011/12 to 68.0% in 2015/16, essentially meeting the target of 69.0%. There were no data available on SPR for later years, although the ICR (page 17) suggested that it was plausible that the positive trends in SPR exhibited up to 2015/16 continued till the end of the project period, as other data support these trends. For instance, administrative data show a substantial increase in student enrollment in the public-private rural schools from 55,256 to 303,405 between 2013 and 2017.

• The middle level school participation rate (ages 11-13 years) increased from 65.6% in 2011/12 to 66.8% in 2015/16, close to the target of 67.7%. There were no data available on SPR for later years.

• The matriculate level school participation rate (ages 14-15 years) increased from 49.8% in 2011/12 to 55.0% in 2015/16, essentially meeting the target of 55.8%. There were no data available on SPR for later years.

• The annual retention rate between Grade 1 and Grade 2 increased from 76.0% in 2011/12 to 87.6% in 2017/18, surpassing the target of 82.0%.

• The annual transition rate from Grade 5 to Grade 6 increased from 56.5% in 2011/12 to 66.8% in 2017/18, surpassing the target of 60.0%.

• The survival rate from Grade 1 to Grade 10 increased from 20.2% in 2012/13 to 29.7% in 2016/17.

### Improved quality of service delivery

• School accountability improved due to the implementation of biometric teacher attendance monitoring systems in 42,383 schools (target: 40,000) and monthly school monitoring, which led to reduced teacher absenteeism (and lower prevalence of 'ghost teachers').

• Schools with the competitively selected head teachers were high performers in the latest SAT round, suggesting improved management and quality of learning in these schools.

• The multiple rounds of school census data generated "useful school data for decision making among policy makers, school management, and other stakeholders" (ICR, page 20), for example, the recruitment of more qualified teachers for science, mathematics, and English was prioritized under the new teacher recruitment policy, and a new teacher training module on science and math was developed.
• The number of functioning schools, retention of students in grades 2, 3, and 4, and staffing of schools all increased, due to intensified community-led engagement through school-management committees (as summarized in ICR, Annex 8; no actual figures reported). The revision of the grant funding formula from flat rate to composite rate based school-level indicators (such as enrollment, classroom-student ratio, and school level) also helped to improve equity among the schools and incentivize the SMCs in taking the lead in increasing enrollment in the schools (no specific details provided).

• Also, quality improvements in service delivery have plausibly contributed to increased enrollment in underserved communities (rural areas), which increased five-fold from 55,256 in 2012 to 303,405 in 2017. Accountability was strengthened by incorporating participation in student testing in the performance agreements, thus contributing to efforts to improve quality.

However, two DLIs were not met:

• The number of schools upgraded to meet basic quality standards fell short of the target; according to the ICR (page 18), the target was not met due to the lack of dedicated project leadership in the last year of project life.

• The number of teachers recruited was not met; according to the ICR (page 19), teacher recruitment and management policy is a highly political and challenging reform agenda in Pakistan, taking time to build consensus among stakeholders. A new teacher recruitment policy was developed and approved in March 2018 to institutionalize the system of merit and needs-based recruitment, but only one round of teacher recruitment took place before project closing.

• Also, the ICR did not report on the timeliness and reliability of financial flows from sector level to schools (though the project team subsequently provided documentation that these disbursement conditions were met) nor on whether the funds, once received, were utilized in a timely and productive manner by schools.

In conclusion, key outcomes in raising school participation were achieved although moderated by some shortcomings in school infrastructure and teacher management.

Rating
Substantial

OBJECTIVE 2
Objective
Measure student achievement

Rationale
The theory of change for this objective was straightforward, although the objective itself was less outcome-oriented. The key output of capacity building for the student achievement test administration was likely to increase the capacity of the government to assess learning outcomes on a regular basis.

**Outputs**

- Six rounds of the student achievement tests (SATs) were administered (target: 6). Tests were administered on math, science, and language in government schools in all districts between academic years 2012/13 to 2017/18, with 319,000 students in 6,030 government schools participating in the final round.

**Outcomes**

- The student participation rate in SATs gradually increased over time to 62% and 39% for Grade 5 and Grade 8, respectively, in government schools in 2018. No baseline data were provided for comparison. The ICR (page 20) noted that several factors which had affected student participation (unfavorable timing of assessment during peak harvesting season, lack of interest among students and parents, and inadequate classroom facilities in many schools creating an uncongenial environment for assessment) were addressed during the project period.

- The findings from each round of SAT were published in annual reports on a dedicated website, school-specific performance was disseminated through school profiles, and parents received individual student results.

- Based on the SAT results, the provincial government prioritized the recruitment of more qualified teachers for science, mathematics, and English under the new teacher recruitment policy. Additionally, a teacher training module was developed based on the SAT findings and training provided to 2,392 science and mathematics teachers.

- A test item bank was developed for different grades and hosted on the SAT website, providing teachers with resources for classroom assessments.

**Rating**

Substantial

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**OVERALL EFFICACY**

**Rationale**

Student participation and measuring student achievement were essentially achieved. The aggregation of two almost fully achieved objectives indicate a Substantial rating for overall efficacy.
5. Efficiency

At the appraisal stage, the economic analysis estimated strong returns on investment. Costs were calculated using public expenditures on education; benefits were estimated based on increases in the number of secondary school completers and increased wages. The net present value (NPV) of costs and benefits was estimated to be at US$11 per child, with a benefit-cost ratio of 1.46.

The ICR (Annex 4) presented an updated cost benefit analysis using the same approach. The costs were calculated using actual education expenditures for the number of students; benefits were estimated based on education profiles of the working population, lifetime earnings profiles, and actual survival rates from Grade 1 to Grade 10 (the latter included a significant increase in secondary school survival rates for girls). The annualized growth rates of survival rates (Grades 1 to 10) were 10% for boys and 18% for girls. The net present value was estimated at US$143 per child, with a benefit-cost ratio of 6.21.

At a project level, the public-private partnership to provide schooling for underserved communities led to increased enrollments at a cost-effective level (the Government’s per student per month subsidy at US$5.32 under the partnership compared to an average public spending of US$8.67 - US$45.20 per student per month under the regular government schooling system).

However, there was frequent turnover in project leadership in the Ministry of Education (four different managers), which slowed the progress of the teacher management and basic quality standard schools activities, and frequent turnover and absence of capable fiduciary staff, which led to procurement delays.

Based on favorable returns and benefit-cost ratios, but with moderate shortcomings in the efficiency of implementation, efficiency is rated Substantial.

Efficiency Rating

Substantial

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

6. Outcome

Relevance is rated High due to strong alignment with the country's education strategy and the Bank's Country Partnership Strategy for FY2015-19. Overall Efficacy is rated Substantial, as the two objectives were almost fully achieved. Efficiency is rated Substantial in view of favorable returns and benefit-cost ratios, but with moderate shortcomings in the efficiency of implementation.

a. Outcome Rating
   Satisfactory

7. Risk to Development Outcome

Key reforms areas supported by the project continue to be government priorities and are being continued under the government's education sector program. Institutional capacity to sustain the reforms through implementing project activities was strengthened through the DLI approach. However, it is not clear whether key inputs - teacher recruitment and infrastructure development - will be increased sufficiently to support increased school participation.

8. Assessment of Bank Performance

a. Quality-at-Entry
   
   This operation built directly upon the experience of the prior Sindh Education Sector Project (P107300), which had substantial achievements in increasing school participation but modest improvements in measuring student learning (IEG Review). Initiatives started under the prior operation included sector management, school census data, school management committees, school infrastructure, public private partnerships, and teacher management. Under the new operation, student achievement tests, school budgets, education management, and school rationalization were new initiatives. Lessons learned from the previous operation were integrated into the project design, including refinements to the disbursement mechanism, continued focus on governance reforms, and increased institutional capacity support. The continuity between the previous and new operations also helped to ensure sustainability and political commitment. As noted in the ICR (page 6), the Bank had established itself as a credible and reliable long-term partner in education and thus continued engagement in the education sector was viewed as critical to promoting politically challenging reforms and strengthening the results orientation. The overall risk was assessed as Substantial due to external factors but also an unpredictable institutional environment - mitigation measures for the latter were effective, including intensive stakeholder engagement, communication campaigns, and capacity building. However, there were some shortcomings in the M&E design, including in the choice of key project indicators and data sources.
Quality-at-Entry Rating
Moderately Satisfactory

b. Quality of supervision
The Bank team was proactive in addressing implementation challenges to ensure that the project remained on track with disbursements and achieving results. Supervision inputs were satisfactory, with frequent missions and strong mix of expertise. The minimal turnover of task team leaders contributed to continuity of dialogue that helped keep the project moving forward. The ICR (page 31) noted that fluctuations in Implementation Supervision Report (ISR) ratings were used effectively to draw attention to critical issues that required action.

Key project indicators were revised through a project restructuring to improve measurability and accuracy, although the potential problems with the main indicator - net enrollment rate - were documented in project supervision reports as early as 2015 but the issue was not corrected until 2017. Fiduciary management was effectively supervised, with only minor shortcomings in overall performance.

Quality of Supervision Rating
Satisfactory

Overall Bank Performance Rating
Moderately Satisfactory

9. M&E Design, Implementation, & Utilization

a. M&E Design
The M&E design monitored multiple aspects of the project, including sector-wide outcomes (school census, student achievement tests), verification of DLI achievements. However, there were some shortcomings in the results framework. The key project indicators were not fully disaggregated by school level, the net enrollment rate (NER) indicator turned out to lack reliability ((a) NER captured only students enrolled in age-relevant grades while late entry into the school system was prevalent and the norm; and (b) an analysis showed potential inaccuracy of age data in household surveys), Also, as noted in the ICR (page 28), the M&E design assigned monitoring and data collection responsibilities across subprogram activities but there was no mechanism to consolidate findings to monitor project performance as a whole. Lastly, there were no evaluative studies in the original M&E design.

b. M&E Implementation
The shortcomings in the results framework were flagged early in the supervision period (2015) although not formally corrected until the project restructuring in 2017. The key project indicator was revised to school participation rates (SPR), in order to capture enrollment of the specified age group regardless of
the level of education enrolled in. However, the choice of SPR as the key indicator still remained a challenge as SPR data would not be available beyond 2017/18, and therefore further indicators on retention and transition rates were added to supplement outcome data. Monitoring of sector-wide results were carried out effectively through the annual school census, student achievement tests, and biometric teacher attendance systems. The use of third party verification of DLI achievements helped ensure reliability of data, and evaluative studies were added to the project design under the TA component, although not all were completed by project closing. The ICR (page 28-29) noted that lack of completed evaluative studies was a missed opportunity for rigorous assessment and knowledge generation on the impacts of governance reforms on project objectives, and that M&E arrangements could have been better coordinated at the school level as there was some duplication of supervision efforts.

c. M&E Utilization

The ICR (page 28) reported that M&E data were used as follows: (a) findings from six rounds of SAT were disseminated to policy makers, schools, parents, and students through online published reports, school performance profiles, and student report cards; (b) annual school census data were disseminated through published reports and school profiles; (c) school census data were used to identify the needs for ‘basic quality schools’ during the restructuring design; (d) SAT results were used to inform policy decision on teacher recruitment and teacher training in subject areas of science, mathematics, and language; (e) teachers’ biometric attendance monitoring results were used to take official measures against high absentee teachers and ‘ghost teachers’; and (f) study findings on viable and nonviable schools were used to inform the school consolidation activity.

In conclusion, in spite of moderate shortcomings, M&E arrangements and implementation were sufficient to assess the achievement of objectives and to test the links in the results chain.

M&E Quality Rating
Substantial

10. Other Issues

a. Safeguards

The project was classified as an Environmental Category "B" project due to minor rehabilitation and civil works. The safeguard on Environmental Assessment (OP/BP 4.01) was triggered. The Environmental and Social Management Framework (ESMF) developed under the prior Bank operation was updated and included mitigation measures, implementation and institutional arrangements, monitoring requirements, and supervision roles and responsibilities. An environmental coordinator was hired to support the implementation of the ESMF.

At project closing, the Bank team conducted an environmental safeguard review and found that the upgrading and rehabilitation work completed under the project had contributed to improved environment of
schools, although the adequacy of operations and maintenance plans remained a concern. Therefore, environmental safeguards compliance was rated Moderately Satisfactory in the last ISR.

The safeguard policy on Physical Cultural Resources (OP/BP 4.11) was also triggered, due to the possibility that school construction activities might interfere with cultural sites. This was reported to IEG by the project team (the ICR has no mention of it). The project team indicated that a Chance Find Procedure was defined and added to the ESMF, in case a situation arose in which digging led to the discovery of artifacts of cultural or archeological significance, but that no such instance arose during the project period.

b. Fiduciary Compliance

Financial management: Financial management was effectively staffed with an experienced senior manager and supporting staff. Accounting records were kept up-to-date and in compliance with reporting requirements. There were minor shortcomings noted in delays in budget releases, leading to payment lags at various points of the project period. Annual external audits were conducted by the Auditor General of Pakistan, with statements submitted to the Bank in a timely manner; however, the ICR does not report on whether there were any qualified audits nor on whether financial management was undertaken in full accordance with Bank guidelines.

Procurement: Although procurement arrangements were maintained from the previous operation, there was frequent turnover in fiduciary staff, including in the procurement specialist position. This led to delays in procurement activities. Measures were taken to strengthen procurement capacity at the project and field levels, and while there were no major problems reported in the last post-procurement review, the ICR does not report on whether procurement was undertaken in full accordance with Bank guidelines.

c. Unintended impacts (Positive or Negative)

None reported.

d. Other

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11. Ratings

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<th>IEG</th>
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<td>Quality of M&amp;E</td>
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<td>M&amp;E arrangements and implementation were sufficient to</td>
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12. Lessons

Lessons drawn from the ICR (pages 32-34), adapted by IEG:

- A results-based approach using disbursement-linked indicators (DLIs) can be effective in helping a government move forward with a challenging reform agenda. In the case of this project, the disbursement incentive provided strong motivation to the government to follow through with difficult policy changes in the areas of school management and consolidation, although less so in the highly politically sensitive area of teacher recruitment and rationalization. Central stakeholders indicated that focusing on DLIs helped to build consensus on shared goals.

- Leveraging the capacity of the private sector can be an effective means to improve access to schooling in rural and underserved communities. In the case of this project, an established public-private partnership with a performance-based aspect - participating in student testing - helped to not only increase access but to address quality of education.

- Country context is an important consideration in selecting key project indicators. In the case of this project, the reality that late entry into schooling was common among children was not recognized at the time of M&E design, thus the original key indicator of "net enrollment rate" was not a sufficiently robust indicator to measure achievement.

13. Assessment Recommended?

Yes

Please Explain

To verify that reforms supported through the disbursement-linked approach are still being continued (sustainability), and to explore how these are impacting overall sector efforts to increase school participation.

14. Comments on Quality of ICR

The ICR was well organized and results-oriented, with the discussion of achievements strongly focused on actual results in improving quality of education, rather than simply reporting on whether DLIs were achieved or not. The theory of change was sound and aligned to development objectives. The quality of evidence had some shortcomings due to weaknesses in the results framework (as discussed in the ICR Review above); nevertheless, the ICR drew upon additional sources of data to provide a more thorough picture of project impact. The ICR's narrative was thorough and supported its conclusions. Lessons were specific and directly derived from project experience, particularly from the innovative approach of using disbursement-linked
indicators. The ICR was overall consistent with guidelines, although it did not provide complete information on safeguard and fiduciary compliance (compliance with the safeguard policy on Physical and Cultural Resources was subsequently confirmed by the project team) such as whether audits were unqualified and whether all financial management and procurement was undertaken according to Bank guidelines. Within the larger context of other favorable criteria, these shortcomings are considered to be relatively moderate.

a. Quality of ICR Rating

Substantial