Report Number : ICRR0020036

1. Project Data

Project ID	Project Name	
P094225	SIF 3	
Country	**Practice Area(Lead)**	**Additional Financing**
Armenia	Social Protection & Labor	P115743,P118158,P128740

L/C/TF Number(s)	Closing Date (Original)	Total Project Cost (USD)
IBRD-78470,IDA-42380,IDA-45480,IDA-50710	30-Jun-2011	66,810,000.00
Bank Approval Date	**Closing Date (Actual)**	
26-Oct-2006	31-Mar-2015	

	IBRD/IDA (USD)	Grants (USD)
Original Commitment	51,000,000.00	0.00
Revised Commitment	50,955,992.26	0.00
Actual	51,884,078.12	0.00

Sector(s)
General water, sanitation and flood protection sector(22%):General education sector(22%):Health(22%):Sub-national government administration(20%):Other social services(14%)

Theme(s)
Municipal governance and institution building(29%):Rural services and infrastructure(29%):Participation and civic engagement(14%):Decentralization(14%):Municipal finance(14%)

Prepared by	Reviewed by	ICR Review Coordinator	Group
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2. Project Objectives and Components

a. Objectives

According to the Project Appraisal Document (PAD, p. vii) and the Financing Agreement of November 1, 2006 (p. 4), the objectives of the project were to “support the Recipient's policy to raise the living standards of the poor and vulnerable groups through: (a) improving the quality and access, and increasing the coverage of community infrastructure and services in poor communities, and for the most vulnerable groups in response to critical emerging needs; and (b) promoting complementary institutional capacity building at the community and municipal level so as to improve the quality and sustainability of service delivery and municipal investments, increase accountability, and

enhance greater stakeholder empowerment at the local level."
Under the first additional financing for the project (February 2009), another output, "the creation of employment associated with the provision of community infrastructure and services," was added, but the objective remained the same. Some outcome targets were also revised, but they were revised upward, and therefore this Review will not perform a split assessment.

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

No

c. Components

The project included three components:
Component 1: Community Investments (appraisal estimate US$17.81 million, actual US$48.57 million (273% of appraisal estimate), financed through three additional financings). This component was to finance the continuation of the Armenia Social Investment Fund (ASIF) II project. Activities included the improvement of procedures in terms of quality of works, sustainability, participation, and targeting of project funds for micro-projects for the provision of social and economic infrastructure in vulnerable communities. These micro-projects would include the construction or rehabilitation of schools, health clinics, community-based centers, small-scale water supply, sewerage, minor irrigation works, and access roads. This component received three additional financings. The first additional financing was to address challenges related to the financial crisis to deliver immediate small-scale infrastructure support and associated employment generation by scaling up community infrastructure activities. The second additional financing was to support the scaling-up of activities under this component, and the third additional financing was to support the scaling-up of the community investment micro-projects.
Component 2: Local level institutional strengthening, monitoring and evaluation (M&E) (appraisal estimate US$2.9 million, actual US$0.15 million (5% of appraisal estimate)). This component was to finance technical assistance, training and support services designed to increase the competencies and accountability of municipal administration in support of the Government's decentralization initiatives. This component was also to finance the piloting of a small-scale municipal development institutional framework to cover municipal investment planning, financial management, and social service delivery. Also, this component was to finance technical assistance and training to support municipal authorities in different areas including designing and implementing municipal investment plans in two pilot municipalities, setting up and managing a municipal investment fund in support of municipal investment plans, and continuing and enhancing training for municipal officials and village council members in the fields of financial management, budgeting, accounting, and asset management. This component also included a sub-component to finance support for an initiative to bolster capacity building by piloting an integrated management framework for implementing social services at the local level.
Component 3: Project Management, Monitoring and Evaluation (appraisal estimate US$3.75 million, actual US$3.15 million (84% of appraisal estimate)). This component was to finance: i) institutional support to the Project Management Unit (PIU) to effectively implement local programs and projects; and ii) evaluation and technical support related to project activities covering special studies and technical assessments, study tours, workshops, and seminars under an integrated development framework.

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

Project cost: The project was estimated to cost US$28.39 million. Actual cost was US$66.81 million, 235% of appraisal estimate. Only 5% of the appraisal estimate for component 2 was spent, as the Government decided to devote less project funding to technical assistance activities.
Financing: Originally the project was to be financed by a US$20 million IDA loan, which was completely disbursed. The project received three additional financings:

- On February 24, 2009 the government requested additional financing in the amount of US$8 million to address challenges related to the financial crisis to deliver immediate small-scale infrastructure support and associated employment generation by scaling up community infrastructure activities under component 1 of the project. Of the US$8 million additional financing, US$7.9 million was disbursed.
- On February 25, 2010 the government requested additional financing in the amount of US$7 million to support the scaling up of activities under component 1, as well ASIF's operating costs for the extended project duration under component 3. This additional financing was completely disbursed.
- On February 14, 2014 the government requested additional financing in the amount of US$11 million to scale up the community

investment micro-projects under Component 1; training, study tours, and a project impact evaluation under component 2; and ASIF's operating costs for the extended project duration under component 3. Of the US$11.8 million under this additional financing, US$10.8 million was disbursed.

Borrower contribution: The borrower was to contribute US$12.4 million. The actual contribution was US$12.5 million.

Dates: The project was restructured six times:

1 On February 24, 2009 the project was restructured to: i) receive additional financing; ii) adapt the PDO to include an additional set of activities related to "creation of employment associated with the provision of community infrastructure and services"; and iii) modify the Results Framework by revising project targets and including new indicators to reflect the additional activities under the additional financing.
2 On February 25, 2010 the project was restructured to: i) receive additional financing; and ii) modify the Results Framework by revising project targets and including new indicators to reflect additional activities under the second additional financing.
3 On December 5, 2011 the project was restructured to: i) extend the closing date of the original loan from June 30, 2011 to March 31, 2012 to allow for the completion of the ongoing micro-projects, some of which were completed using savings obtained during project implementation.
4 On February 14, 2012, the project was restructured to: i) receive additional financing; and ii) modify the Results Framework by revising project targets.
5 On March 15, 2012 the project was restructured to extend the closing date for the second additional financing from March 31, 2012 to October 31, 2012 to allow for the completion of several micro-projects.
6 On February 5, 2014 the project was restructured to extend the closing date for the third additional financing from March 31, 2014 to March 31, 2015 to allow for the completion of several micro-projects.

3. Relevance of Objectives & Design

a. Relevance of Objectives

High: The objectives of the project were highly relevant given Armenia's challenges in quality of and access to health, education, and social services for the poor; weak institutional capacity of local administrative units in legal, financial, and functional areas; and limited financial resources for the decentralized management of service delivery. Also, the lack of involvement of local institutions, village councils, and citizens in the decision making process and in service provision had a negative impact on the country's institutional capacity. The objectives were in line with the government's development policy framework to raise the living standards of the poor and vulnerable groups, with a special focus on health, education, and social services.
The objectives were also in line with the Bank's Country Assistance Strategy (2004-2008) at the time of appraisal. One of the three objectives of the Country Assistance Strategy was to reduce non-income poverty through improvements in the delivery of health, education, and social services. The objectives were also in line with the Bank's Country Partnership Strategy (FY2014-FY2017) at the time of project closing, which aims to support competitiveness and job creation, improve efficiency and targeting of social services, and improve governance and anticorruption measures in public services.

Rating
High

b. Relevance of Design

Substantial: The project's design was relevant and built on previous Bank-financed projects. The project was designed around small-scale investments in community infrastructure such as the construction of schools, kindergartens, health facilities, and community centers. By hiring local workers for the construction of civil works and furniture related to education, health, and social services, local employment opportunities were created. Also, capacity was built within community councils, school boards and project implementation committees to effectively plan and manage their micro-projects (MPs) and strengthen relationships with local governments. The underlying assumptions about how program actions would lead to intended outcomes were logical and properly laid out. The design included a well-developed targeting mechanism that defined the vulnerability of communities through an econometric analysis of a national community survey. Thirteen indicators, which were strongly statistically correlated with a community's predisposition to fall under the nationally-defined poverty level, were used.

Rating
Substantial

4. Achievement of Objectives (Efficacy)

Objective 1

Objective
Raise the living standards of the poor and vulnerable groups

Rationale
The project included a targeting mechanism that defined the vulnerability of communities through an econometric analysis of a national community survey. Thirteen indicators, which were strongly statistically correlated with a community's predisposition to fall under the nationally defined poverty level, were used.
Although the Results Framework did not include indicators for such direct and aggregate living standards indicators as income and poverty, achievement of the objective to raise living standards can also be assessed through the following results related to access to services and employment:
Outputs:
• 319 micro-projects (MPs) were implemented, reaching 1.68 million beneficiaries, focusing on community infrastructure and services to provide higher quality and better access in poor and vulnerable communities that were targeted under the project. This surpassed the original target of 170 MPs and the revised target of 283 MPs.
Under the project the following MPs were implemented:

- 23 health facilities were constructed, renovated or equipped, reaching 606,483 beneficiaries.
- 88 community centers were constructed, renovated or equipped, reaching 424,200 beneficiaries.
- 44 kindergartens were constructed, renovated or equipped, reaching 100,587 beneficiaries.
- 18 special schools were constructed, renovated or equipped, reaching 156,421 beneficiaries.
- 17 MPs invested in portable water, reaching 34,830 beneficiaries.
- 9 MPs focused on environmental issues, reaching 234,909 beneficiaries.
- 5 MPs focused on elderly houses, reaching 1,153 beneficiaries.
- 2 MPS focused on irrigation, reaching 2,639 beneficiaries.
- 1 MP focused on sewage systems, reaching 2,300 beneficiaries.
- Social service delivery systems were strengthened through three integrated social service centers, achieving the target.

• 846 schools and kindergartens were equipped with school and kindergarten furniture, surpassing the original target of 700 and revised target of 822 schools and kindergartens.
• 65 community centers benefited from new furniture, surpassing the original target of 11 and revised target of 40 centers.
• 716 key stakeholders were trained under the project in areas such as financial management, budgeting, accounting, and asset management, not achieving the original target of 1,000 stakeholders, and just achieving the revised target of 715 stakeholders, which was revised to reflect the budget allocation for this activity.
• The project financed three beneficiary assessments (2008, 2011, and 2014), two assessments of the cost-effectiveness of MPs, an assessment of the sustainability, maintenance, and labor impact of the MPs, and an assessment of the quality of civil works projects.
• 184 communities were empowered through capacity building to effectively plan and manage their investments on a sustainable basis and

strengthen partnerships with local governments, achieving the original target of 150 communities and the revised target of 158 communities.
• 668,738 job-days were created by March 2015, surpassing the original target of 285,190 job-days and the revised target of 535,000 job-days.
• 52,099 job-days were created from the local manufacturing of new school furniture, surpassing the original target of 34,300 job-days and the revised target of 40,600 job-days.

Outcomes:

• The satisfaction rate of beneficiaries on the quality of infrastructure and services received was 85%, surpassing the target of a 70% satisfaction rate.
• 38,221 people have access to project areas with improved water sources. This indicator did not have a target value, as the MPs were selected during project implementation and the indicator was only tracked at project closing.
• 35.5% of the rural population in targeted communities benefited from improved social/economic infrastructure and social services, surpassing the original target of 22.7% and the revised target of 27.6%.
• In 2012, the project financed an assessment on sustainability, infrastructure maintenance, and labor impact. This assessment found that overall, measures to ensure sustainability such as planning, operation and maintenance were missing due to insufficient resources in the vulnerable project communities. Operation and maintenance plans for investments made by the project were only available for 44% of the sampled facilities. While the assessment rated the current state of most infrastructure as good or excellent, long-term sustainability was raised as an area of concern.
• A beneficiary assessment conducted in 2014 found that community members felt that the implementation of the projects had a positive impact on creating a climate of partnership, trust and respect. No other evidence is available.
• US$11.2 million in wage income was generated through completed MPs, surpassing the original target of US$4.3 million, which was set under the first additional financing and the revised target of US$8.2 million, which was set under the third additional financing.
• The total value of income generated from the local manufacturing of new school furniture was US$0.57 million, not achieving the original target of US$0.61 million, which was set under the first additional financing, but achieving the revised target of US$0.44 , which was set under the third additional financing.

Rating
Substantial

5. Efficiency

Substantial: Neither the PAD nor the ICR included a traditional economic analysis. The PAD (p.18) states that no economic analysis was conducted because the specific set of MPs to be selected was unknown during project preparation. Also, the PAD states that no financial analysis was conducted because the project did not generate any revenue.
The ICR refers to cost-effectiveness studies of civil works and a review of comparable Bank-financed projects, which were conducted during the preparation of the Bank’s Social Investment and Local Development project, a follow-on project, to estimate an Internal Rate of Return (IRR). The cost-effectiveness studies compared costs of civil works per square meter with NGO- and government-financed projects. The analysis found that for renovations, the budget costs per square meter for this project's MPs were the lowest (1.1–1.48 times less than comparators). For reconstructions, the costs of project-supported MPs were also the lowest (1.04–3 times less). For new constructions, the project's MPs were 1.06 times less expensive than a NGO project and 1.12 times lower than projects financed by government line ministries. An additional analysis of budget costs per square meter surface of heated buildings found that, with the exception of two cases, this project's MP costs were lower by 6 to 51 percent.
The review estimated the IRR for kindergarten micro-projects, which was 18 percent for this type of project. Additional analysis on comparable projects in Armenia (potable water and secondary schools) was conducted to obtain additional data points to estimate the economic returns to these micro-projects. The rehabilitation of secondary schools in Armenia was estimated to have a cost-benefit ratio of 3.3 per student, and building potable water connection was estimated to have an IRR of between 10 and 26 percent for different projects.
These analyses are indicative of efficient use of project resources. Implementation efficiency is also indicated through effective procurement and financial management processes (see Section 11b). Project efficiency is therefore rated Substantial.

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:

	Rate Available?	Point value (%)	*Coverage/Scope (%)
Appraisal		0	0 ☐Not Applicable
ICR Estimate		0	0 ☐Not Applicable

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

6. Outcome

Relevance of objectives rated High due to the project’s investments in Armenia’s priority areas as identified by the Bank’s Poverty Reduction Strategy Paper approved in 2003 and overall congruence with Bank and Government strategy. The relevance of design is rated Substantial due to logical and plausible linkages between planned activities and anticipated outcomes. The achievement of the objective to raise the living standards of the poor and vulnerable groups is rated Substantial. Efficiency is also rated Substantial. These ratings are indicative of only minor shortcomings in the project's preparation and implementation, resulting in an Outcome rating of Satisfactory.

a. Outcome Rating
Satisfactory

7. Rationale for Risk to Development Outcome Rating

The government continues to be committed to supporting the development of more infrastructure for the delivery of social services. However, during project implementation the impact of the global financial crisis affected the communities’ ability to co-finance the implementation and operation & maintenance of micro-projects. This continues to be a risk going forward, given Armenia’s uncerain economic outlook. Also, an assessment on sustainability, infrastructure maintenance, and labor impact conducted in 2012 found that overall, measures to ensure sustainability such as planning, operation, and maintenance were missing due to insufficient resources in the vulnerable project communities. Operation and maintenance plans for investments made by the project were only available for 44% of sampled facilities. While the assessment rated the current state of most infrastructure as good or excellent, long-term sustainability was raised as an area of concern. Given the lack of the government’s own financial resources, the Bank has approved a US$30 million follow-up project to ensure the continuous implementation of social investment fund-type programs and the maintenance and operation of infrastructure by communities. Also, other donors have committed or are intending to commit additional financial resources to the Armenia Social Investment Fund. Therefore, the risk to development outcome rating is Modest.

a. Risk to Development Outcome Rating
Modest

8. Assessment of Bank Performance

a. Quality-at-Entry
The project was prepared in only seven months and built on the ASIF I and II projects. The project took lessons learned from these two previous operations into account. Those lessons included the following: i) It is critical to improve the targeting strategy using a two-stage process, consisting of geographical targeting of project funds by region followed by the identification of needy communities within each region; ii) Adequate quality of works is critical for sustainability and client satisfaction; and iii) Local institutional capacity building and self-management of institutions is important for the sustainability of activities after project closing.

During project preparation several meetings were held with other development organizations to learn from their experience and ensure that there was no unnecessary overlap between projects.
The Bank identified several relevant risk factors during preparation, including the ability of the project to cover poor and vulnerable communities due to rising construction costs, which was rated as Substantial. The Bank's mitigation efforts (to use cost-effective, standardized, and functional designs for construction works, ensure the use of cost-effective construction methods and techniques, intensify supervision, and ensure additional funding from donors and sponsors) were adequate.
The Results Framework had shortcomings, including the specification of several indicators that were tracking the same progress (see Section 10a for more details).

Quality-at-Entry Rating
Moderately Satisfactory

b. Quality of supervision

The Bank team conducted supervision missions on a regular basis. During the last six years of project implementation, the Task Team Leader was based in the region, which allowed an increase in the number of supervision missions and field visits and close cooperation with ASIF.
When ASIF encountered lowered capacity in procurement due to the departure of a staff member, the Bank hired a short-term consultant to provide technical support and train newly hired staff. Also, when there was a need to increase ASIF's civil engineering capacity for the implementation of activities under the third additional financing, the Bank hired a short-term consultant to review the technical designs of the new micro-projects and ensure compliance with required standards.
The Bank team also ensured compliance with the Bank's financial management and procurement rules. However, the Bank could not come to agreement with the Government to improve the results framework to be able to assess a wider spectrum of results arising from project implementation.

Quality of Supervision Rating
Satisfactory

Overall Bank Performance Rating
Moderately Satisfactory

9. Assessment of Borrower Performance

a. Government Performance

The government was highly committed to the project during project preparation and implementation. The prime minister chaired the board of the ASIF, which was responsible for ensuring that project activities were consistent with social sector strategy priorities and government reform programs in relevant sectors, throughout project implementation. The board also included other members of government and representatives from local governments, NGOs, and civil society.
The Ministry of Finance was responsible for providing ASIF with the planned counterpart financing, which it adequately did. The Ministry of Territorial Administration and Emergency Situations developed the strategic regional development framework, which enabled the implementation of the project at the community level.

Government Performance Rating
Satisfactory

b. Implementing Agency Performance

The project was implemented by the ASIF, which already had over ten years of implementation experience involving Bank-financed projects. ASIF was responsible for the implementation of the project, data collection, analysis, and information dissemination.
ASIF's experience in implementing Bank projects and its staff's knowledge of Bank rules had a positive impact on financial management and procurement, and the project did not encounter any major fiduciary problems. However, the ASIF temporarily lacked sufficient procurement capacity due to the departure of a staff member; this minor shortcoming was effectively overcome with support from the

Bank team. M&E was well embedded within ASIF and had sufficient stakeholder ownership.

Implementing Agency Performance Rating
Satisfactory

Overall Borrower Performance Rating
Satisfactory

10. M&E Design, Implementation, & Utilization

a. M&E Design

The original Results Framework in the PAD included four PDO indicators and 17 intermediate outcome indicators. Most aspects of the objective were reflected in the indicators. All indicators were measurable in terms of numbers but lacked baselines, and all were output- rather than outcome-oriented. The M&E design was well embedded in a newly created Management Information, Monitoring and Evaluation Department within ASIF and had sufficient stakeholder ownership.

b. M&E Implementation

During project implementation, software for the Management Information System was upgraded to strengthen monitoring and reporting capacity. During the Mid-Term Review, the Bank and ASIF decided to conduct additional evaluation activities beyond monitoring the indicators included in the Results Framework. A beneficiary assessment, assessments of sustainability and infrastructure maintenance, the labor impact of micro-projects, the cost-effectiveness of civil works, and the quality of civil works were conducted. Also, indicators to assess the number of jobs created and the wage income generated by the project were added during project implementation.
The original Results Framework was revised three times:
In February 2009, the project received additional financing and the Results Framework was modified. Activities related to "the creation of employment associated with the provision of community infrastructure and services" were added. Also, targets for some indicators were revised upward to reflect scaled-up activities, and six intermediate outcome indicators were added.
In February 2010, the project received another additional financing and the Results Framework was again modified, with six intermediate outcome indicators added and some targets again revised upward to reflect scaled-up activities.
In February 2014, the project received a third additional financing and several intermediate outcome indicators were revised.
A Quality Assessment of the Lending Portfolio, conducted in 2010, identified the following weaknesses of the Results Framework: i) relevance of the Results Framework to the assessment of achievement of objectives (focused on outputs rather than outcomes); and ii) inability to assess aspects related to the community's ability to pay for infrastructure and services, measurement of benefits from prior operations, and the nature of national poverty and how this project would reduce vulnerability.

c. M&E Utilization

A small amount of the Management Information System data is being published on the ASIF's website. However, the ICR does not comment on whether the project's M&E data and analysis were used to inform policy and/or decision making.

M&E Quality Rating
Modest

11. Other Issues

a. Safeguards

The project triggered OP/BP 4.01 Environmental Assessment and was classified as Environmental Category “FI” (Financial Intermediary), with the exception of the third additional financing, which was classified as category ‘B’. Only micro-projects of environmental categories B and C could be financed. There was no separate environmental assessment; however, the ASIF developed guidelines for environmental procedures (Environmental Management Guidelines) and included them in the project’s operational manual. These guidelines provided an environmental management framework for project implementation. The guidelines were revised appropriately at the additional financings. ASIF carried out environmental screening of micro-project proposals, classified the micro-projects by environmental categories, and assessed potential impacts of micro-projects and adequacy of the proposed mitigation measures. Most micro-projects fell under environmental category C and did not require an environmental assessment. Proposals classified as category B required a simple environmental overview and the development of environmental management and monitoring plans. The ICR reports no major issues with safeguard compliance (ICR, p. 25).

b. Fiduciary Compliance

Financial Management
Financial management did not encounter any difficulties during project implementation and was consistently rated Satisfactory except in February 2014, when it was downgraded to Moderately Satisfactory due to shortcomings in contract management and monitoring. However, the shortcomings were addressed and the rating was promptly upgraded to Satisfactory.
The financial management arrangements were adequate, and ASIF had sufficient staff with extensive experience in Bank-financed projects. Also, internal control procedures and filing systems were appropriate. Interim financial reports were submitted on a regular basis. Audits were conducted on an annual basis and the external auditor’s opinions were not qualified. At project closing, there were no pending audit reports.
Procurement
ASIF was also responsible for the implementation of procurement activities and was familiar with the Bank’s procurement rules. The project did not encounter procurement-related challenges. On the local level, selected communities were responsible for procurement under micro-projects. On occasion the interest of bidders was limited, leading to a small number of bids for each procurement.
At times, ASIF’s procurement capacity was weakened due to procurement specialists leaving the organization. The Bank addressed this issue by hiring short-term consultants to provide procurement support and train newly hired staff.

c. Unintended impacts (Positive or Negative)

None noted.

d. Other

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12. Ratings

Ratings	ICR	IEG	Reason for Disagreements/Comment
Outcome	Satisfactory	Satisfactory	---
Risk to Development Outcome	Modest	Modest	---
Bank Performance	Moderately Satisfactory	Moderately Satisfactory	---
Borrower Performance	Satisfactory	Satisfactory	---
Quality of ICR		Substantial	---

Note
When insufficient information is provided by the Bank for IEG to arrive at a clear rating, IEG will downgrade the relevant ratings as warranted beginning July 1, 2006.
The "Reason for Disagreement/Comments" column could cross-reference other sections of the ICR Review, as appropriate.

13. Lessons

The ICR (pp. 28-29) provides valuable lessons, including the following:

1 Poverty targeting is critical for equitable and adequate allocation of project resources. In this project, targeting involved a two-stage process, geographical targeting at the regional level, and then identifying the neediest communities within each region through community mapping and profiling based on previously agreed criteria. This type of targeting was effective in selecting beneficiary communities.
2 Enforcing operations and maintenance requirements and budgeting adequately for these requirements is important for the long-term sustainability of infrastructure built in communities. For this project, a study conducted in 2012 found that only 44% of sampled micro-projects had operation and maintenance cost planning and estimates for the year before.

14. Assessment Recommended?

No

15. Comments on Quality of ICR

The ICR provides a comprehensive overview of project preparation and implementation. The ICR is internally consistent and provides useful lessons learned. However, the ICR does not provide information on whether an Environmental Assessment was implemented, even though OP/BP 4.01 was triggered. The ICR would have also benefited from a more detailed explanation of project costs and financing in Annex 1, given the project's financial complexity with three additional financings. The ICR is therefore rated Substantial, with shortcomings.

a. Quality of ICR Rating
Substantial