



1. Project Data

Project ID P120913	Project Name Strengthen SSN - Results	
Country Moldova	Practice Area(Lead) Social Protection & Labor	
L/C/TF Number(s) IDA-50010	Closing Date (Original) 30-Jun-2016	Total Project Cost (USD) 33,407,837.37
Bank Approval Date 09-Jun-2011	Closing Date (Actual) 31-Dec-2017	
	IBRD/IDA (USD)	Grants (USD)
Original Commitment	37,000,000.00	0.00
Revised Commitment	36,546,969.60	0.00
Actual	33,407,837.37	0.00

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2. Project Objectives and Components

a. Objectives

The project development objective (PDO) was to improve the efficiency and equity of Moldova's social safety net through a fiscally sustainable expansion and strengthening of the Ajutor Social Program. The Financing Agreement and the Project Appraisal Document (PAD) have the same wording for the PDO.



The original PDO was not modified during the project's restructuring, and there were no substantive changes to outcome targets. One target was updated as a result of new census data, but this change did not affect the project's ambition or scope. A split evaluation is therefore not warranted.

b. Were the project objectives/key associated outcome targets revised during implementation?
No

c. Will a split evaluation be undertaken?
No

d. Components

Component 1. Sustainable Expansion of Ajutor Social (AS) Benefits and Targeted Heating Allowances (appraisal US\$31 million; actual International Development Association (IDA) US\$28.49 million). This component was to support the interim transitional costs of expanding the poverty-targeted means-tested AS Program and the accompanying Heating Allowances, and the consolidation of the entitlement-based categorical benefits (Nominative Compensation, NC). The NC program had provided discounts on payments for gas, electricity, heating, child and disability benefits, and community services through entitlements to certain categories of people (e.g. disabled, veterans, single pensioners, Chernobyl victims, etc.) regardless of their welfare status (PAD, p. 3). This component was designed as a results-based financing where disbursements were triggered by achievement of specific results formulated as disbursement-linked indicators (DLIs) that included interim outcomes, outputs, and actions critical for achieving outcome targets.

Component 2. Institutional Strengthening for Benefits Administration (appraisal US\$6 million; actual IDA US\$4.90 million). This component was to support measures to strengthen the basic architecture of the social safety net, with a focus on the AS program. These measures included mainstreaming the functions of program management, oversight, and controls, and supporting the institutional structure of the Ministry of Labor, Social Protection, and Family (MLSPF); strengthening institutional roles and capacities, operating processes, and systems; and sustaining a communications campaign to promote increased awareness of the program and of the need for reforms. This component followed standard World Bank procedures for investment lending.

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

Project cost and financing: This was a Specific Investment loan. The original IDA loan was US\$37 million. The actual disbursed amount was US\$33.4 million. According to ICR, about 9 percent of the loan was not used. The unused part had been intended to cover part of the technical assistance (TA) and training that did not take place because the newly created executive agency for social assistance (Social



Assistance Agency) could not absorb it. This amount was cancelled at the third restructuring in January 2017.

Borrower Contribution: The Government of Moldova was to provide approximately US\$245 million equivalent co-financing to the first component. Actual government support to the program during 2010-2016 was MDL 3,116 million, which is approximately US\$183 million using the exchange rate at closing. This contribution is approximately equal to US\$270 million, if the exchange rate at appraisal were to be used (as required by the ICR guidelines).

Dates: The project became effective in October 2011, five months after its approval. It closed on December 31, 2017, 18 months after its original closing date of June 30, 2016. The project underwent three formal restructurings:

- **1st restructuring (June 22, 2015)** made changes in the list of DLIs and extended the closing date for one year, from June 30, 2016, to June 30, 2017.
- **2nd restructuring (June 20, 2017)** extended the project for another six months until December 31, 2017. The government requested this restructuring to approve legislation on consolidating some of the categorical benefits that would allow the project to (partially) meet one of the key DLIs and thus trigger the disbursement attached to that DLI.
- **3rd restructuring (January 9, 2017)** cancelled the undisbursed portion of the credit.

3. Relevance of Objectives

Rationale

The project's PDO to improve the efficiency and equity of Moldova's social safety net remains highly relevant to the country context and to the World Bank Group's country program. The policy changes that the project aimed to pursue were relevant at the time of project appraisal. Since 2008, the government had committed to improving its social assistance system. Before starting the reforms, Moldova had one of the lowest levels of targeting accuracy in the region. Although social protection spending was high, social assistance efforts were fragmented and inefficient. Coverage of social assistance was modest as well, despite high spending levels. The objectives remain highly relevant to this country context.

The project was designed to build on an earlier Bank-supported program (Health Services and Social Assistance Project (HSSAP, 2007-2014, US\$ 17 million) that had an objective to improve the targeting of social transfers. This project's objectives were highly aligned with Moldova's FY18-21 Country Partnership Framework, Focus Area 2, "Service governance - improving efficiency, quality, and inclusive access to



public services," and they were relevant to one of the seven strategic priorities in Moldova's National Development Strategy, *Moldova 2020*, to improve social insurance and pensions.

Rating

High

4. Achievement of Objectives (Efficacy)

Objective 1 Objective

Improve the efficiency of Moldova's social safety net

Rationale

- The project defined six outcome indicators grouped under three result areas to track progress towards the PDO: 1) Improved **equity** by increasing Ajutor Social Program coverage and maintaining targeting accuracy; 2) Increased **allocative efficiency** by reducing spending on categorical benefits; and 3) Enhanced administrative efficiency, governance, and transparency of the social assistance system.

According to the PAD, the PDO was to be achieved by supporting the interim costs of expanding the AS program and consolidating other benefits (NCs). Both measures were needed for fiscal sustainability of the social safety net.

The program specifically aimed to improve **efficiency** through *increasing the allocative efficiency and administrative efficiency, governance and transparency of the Ajutor Social and Heating Allowance programs*.

Outputs

- The Heating Allowance, as a top up to the AS, was put in place.
- A social inspection agency was established in 2011 and is functional.
- Service delivery standards and a business model for Social Assistance Departments (SADs) to carry out administration of the AS program at the local level were developed and approved in 2015.

Intermediate outcomes

- Disability and other categorical benefits (NCs) were consolidated, with the exception of child benefits.



- The ICR (p. 33) stated that M&E capacity related to social assistance policy was strengthened in the MLSPF, but little detail was provided on this point.

Outcomes

- **Allocative efficiency.** Spending on categorical benefits was reduced by 2013 to 32% of the pre-reform (2010) level, meeting the target. However, this progress reversed in the subsequent years due to changes in the government’s political commitment. This outcome was therefore only partially achieved.
- **Administrative efficiency.** The turnaround time for processing AS applications, including verification and eligibility decisions, was significantly reduced from the baseline of 30 days to 9.1 days. This surpassed the targeted 15 days.
- **Losses from irregularities in AS benefits were reduced.** The original target (30%) was replaced by data from the new Social Inspection agency that used different methodology. As a result, the final estimates of the improvement (79% reduction) were significantly higher than anticipated earlier. This target was fully met.
- **Program Awareness.** The percentage of Moldovan citizens who are aware of the AS program increased from 78% in 2010 to 97% in 2017, surpassing the target of 93%.

The ICR reported that the project succeeded in strengthening the administration of social benefits through implementation of number of technical assistance activities, training and information system modernization. However, it did not provide evidence on a large number of outputs and intermediate outcomes planned to achieve administrative efficiency. For example, it is unclear whether a functional review of the MLSPF was carried out to support restructuring of the entity, how management information systems were used to streamline AS benefits processing by SADs, or exactly how the rate of detected benefits irregularities improved over time. The ICR (p. 21) noted that there still is insufficient capacity to improve and sustain the information system supporting social benefits administration, which puts the systematic and efficient use of this system at risk.

Given demonstrated improvements in turnaround time and decreased losses due to irregularities (including fraud), which were key for improving the Ajutor Social’s efficiency, achievement of this objective is rated Substantial.

Rating
Substantial

Objective 2
Objective



Improve the equity of Moldova's safety net

Rationale

The project aimed to improve the **equity** of Moldova's safety net *by increasing coverage and maintaining targeting accuracy of the Ajutor Social program.*

Outputs

- The number of households receiving AS benefits grew from 32,000 in 2011 to 54,839 at the end of 2017, very close to the adjusted target of 55,000.
- The policy rule to periodically review the guaranteed minimum income eligibility threshold (to promote expansion of AS benefits coverage) was adopted.

Outcomes

- Coverage of the AS program increased from 14.3% of the household in the poorest quintile of the population in 2010 to 26.8% at project closure, surpassing the target of 20%.
- 77.3% of AS transfers reached the poorest population quintile in the final year of the project. This coverage of the poor remained above 70% throughout the project period.

Targets were reached or exceeded for the equity-related outcome indicators, but because of limited evidence on some dimensions, achievement of this objective is rated Substantial. There are some caveats in the data presented in the ICR. For example, it did not take into consideration the results of the previous project, which had a similar coverage target. The Moldova Health Services and Social Assistance Project (HSSAP) project that was closed in 2014 claimed an increase of households that benefited from AS at least once during the lifetime of the project from 151 households in 2008 to 57,000 households in 2014. The ICR failed to recognize the efforts of the HSSAP in initiating the AS reforms (with the exception of the role of the project in establishing the MIS) and early results. It also did not provide evidence on whether the program implemented a number of important measures envisaged to improve the design and uptake of the AS program (PAD, p. 38), such as refining the eligibility criteria by updating the proxy formula, streamlining the methodology for entering cadaster income, refining the program exit threshold, or establishing work requirements to reduce AS dependency and work disincentives. Furthermore, while coverage and targeting improved, an external evaluation of the program carried out in 2016 recommended number of additional steps to improve the program's targeting and coverage methodology. Finally, no detailed information is provided on the communications campaign.



Rating
Substantial

Rationale

The project largely succeeded in helping the Moldovan government to improve the efficiency and equity of Moldova's safety net by contributing to consolidating small and inefficient NCs into the AS and Heating Allowance programs. Spending on categorical benefits was reduced from 1.2 percent of gross domestic product (GDP) in 2010 to 0.7 percent in 2016 and further to 0.5 percent in 2018, which should contribute to fiscal sustainability of Moldova's social safety net. Spending on both the AS and Heating Allowances programs represented 0.5% of GDP in 2018. The program also succeeded in improving coverage of the poorest segments of the population and significantly improved targeting accuracy, although the methodology for targeting and coverage requires further improvements in order to have wider impact. There are also some caveats around results reporting, such as missing data on a number of outputs and intermediate outcomes related to improving AS program administration and governance. These shortcomings, however, did not prevent the project from achieving its PDO.

Overall Efficacy Rating
Substantial

5. Efficiency

Economic Analysis

Improving the efficiency of Moldova's social safety net was one of the outcomes supported by the project, and therefore sector efficiency is discussed in Section 4. No full-fledged cost-benefit analysis was carried out in the PAD because the project had a large results-linked disbursements component, but the project's Operations Manual indicated that the co-financing linked to each DLI was carefully costed by the project team. Rather, the efficiency analyses in both the PAD and the ICR focused on the broader impact of improving social safety nets on poverty. The PAD used 2010 Household Baseline Survey data to simulate the net impact of AS and Heating Allowance transfers on poverty (poverty headcount rate and poverty gap) and income inequality (Gini coefficient) for the years 2011 and 2012. The model predicted modest gains from the program that would grow over the years as the AS program expands. According to the simulated model, in the case of full household consumption of both transfers, the net impact on the poverty rate would have been 1.1% and inequality would have been reduced by 0.6 percentage points. Under a scenario of 50% consumption of the transfers, the simulated result was a 0.4% reduction in the poverty rate and 0.3-point reduction in income inequality. In 2012, with further expansion of the program, the model predicted a slightly



higher net impact on poverty and inequality. The model did not take into consideration other factors, such as pensions and remittances, that could have had an impact.

The ICR did not update the economic analysis carried out in the PAD. Rather, it drew on the findings of an external evaluation of the AS program (2017) and updated Household Baseline Surveys. The evaluation demonstrated that, compared to the pre-program period (2006), the AS and Heating Allowance benefits in 2016 were better targeted, had higher coverage of the poorest quintile of the population, and represented about one third of household consumption levels for that decile (table 4.1, ICR, p. 47). However, while the living conditions of the main beneficiary group improved as a result of those benefits, they were still significantly lower than those of the average household. The overall improvements in poverty and lowering of inequality cannot be attributed to this social assistance program. The 2016 Moldova Poverty Assessment suggested that more of these gains may be associated with pension transfers and remittances (ICR, p. 20).

Design and implementation

Use of DLIs: The ICR did not discuss the impact of DLIs on the project's internal efficiency. According to the ICR (p. 12), a large number of DLIs was applied to provide more flexibility during implementation, through creating options for disbursements based on smaller, discrete steps of the policy agenda. The ICR did not reflect on the transaction cost of having so many indicators that were to be monitored so frequently. The project TTL indicated that monitoring and reporting on DLIs has not been difficult. However, use of DLIs in social protection is still relatively new area, and it would have been useful to get the borrower's feedback on the use and reporting of DLIs for the learning purposes.

The project experienced significant delays at the design and implementation stages. It became effective in October 2011, five months after its approval rather than the standard 90 days. It was extended twice and closed 18 months after its original closing date of June 30, 2016. The three formal restructurings did not add any new outcome indicators/targets or additional financing. According to ICR, the extensions were largely due to country-specific political circumstances: gaps in the authorizing environment on the government's side between elections, and the need to reconfirm commitments with a new government to accomplish the policy actions that were critical to meeting the DLIs and subsequently the PDOs. The ICR (p. 21) also noted some moderate administrative and communications problems during implementation due to the restructuring of the Ministry of Social Protection and the Ministry of Health, Labor and Social Protection. The project lasted six and half years instead of the planned five years while achieving the same planned objectives and targets. The time and resources spent on the additional 18 months of project implementation and supervision suggest some inefficiencies.

Efficiency Rating

Modest

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



	Rate Available?	Point value (%)	*Coverage/Scope (%)
Appraisal		0	0 <input type="checkbox"/> Not Applicable
ICR Estimate		0	0 <input type="checkbox"/> Not Applicable

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

6. Outcome

The objective to improve the efficiency and equity of Moldova's social safety net through a fiscally sustainable expansion and strengthening of the Ajutor Social Program remains **highly relevant**. The AS program has become the largest social assistance program in Moldova. The project largely succeeded in helping the Moldovan government to improve the efficiency and equity of Moldova's safety net, although its administration and coverage/targeting methodology require further improvements in order to sustain results. Its efficacy is rated Substantial. Project efficiency is rated **Modest** due to shortcomings in operational efficiency. These ratings indicate moderate shortcomings in the project's preparation and implementation, leading to an Outcome rating of **Moderately Satisfactory**.

a. Outcome Rating

Moderately Satisfactory

7. Risk to Development Outcome

The risk to sustaining the development outcomes is **High**. One of the two critical assumptions made in the theory of change of the project -- that the government maintains policy and reform direction -- is not fully in place (ICR, p. 7). First, the government of Moldova reversed its position on eliminating some of the categorical benefits during the implementation of the project. There is a risk that the number of and spending on categorical benefits may increase, especially with the country entering another election cycle in February 2019. Second, recently the government introduced elements (pro bono community works in exchange for receiving AS assistance by the unemployed) that the Bank and an external evaluation found unnecessary and detrimental to the credibility of the program. Both the ICR and the external evaluation suggested that the risk of creating "dependency on benefits" is low, and such a move may not support the program's key purpose of improving targeting and coverage. The borrower, however, insisted on maintaining the community work precondition as a useful addition to the program.



8. Assessment of Bank Performance

a. Quality-at-Entry

Overall, the project was well prepared. The project was designed to pursue further the achievements of the predecessor project (HSSAP), which points to strong synergies between the two. The Bank team prepared a detailed Project Operations Manual to help with implementation, including measures to prevent possible misuse of funds. The objectives and key outcome indicators were clear and realistic. The potential risks to project's development outcomes, such as weak political commitment, possible resistance to the proposed reforms, and low institutional capacity, were identified, and some measures to mitigate the risks were highlighted (i.e. firm commitment of the government at the time of the project appraisal, a communications campaign, and backing from the International Monetary Fund's stabilization program (PAD, p.24), and provision of technical support to improve institutional capacity). Nevertheless, the political sensitivity of such reforms and the risk of policy reversal seem to have been underestimated, and the proposed mitigation measures were not sufficient. By and large, reduction or removal of categorical benefits in post-socialist countries have been challenging even in relatively stable political environments, let alone in a context of very frequent government changes. Wavering political support ultimately had an impact on outcomes (retention of the child benefit, for example). Better prior analysis of the political economy of reforms in a politically uncertain environment, including learning from similar reform experiences in comparator countries on how the progress in reforms can be sustained, would have been helpful. In addition, better understanding of country capacity to administer large safety net programs and, in that context, seeking synergies with the Moldova e-Transformation project (2011-2016, US\$ 20 million) could have been useful in strengthening the management information system as well as building local capacity.

Quality-at-Entry Rating
Moderately Satisfactory

b. Quality of supervision

The Bank provided solid implementation support. The project was implemented in a period when the country was going through frequent political changes (i.e. seven government changes in less than two years over the 2014-2016 period). The Bank was proactive and responsive to client needs and demands. The project restructurings were used to effectively navigate through those challenges and make sure the project was implemented as planned. However, none of the Implementation Status Reports discussed the more fundamental question of how the results-based approach was working in a politically unstable environment, especially from 2014 to 2016 when the governance situation was particularly challenging. Clearly, the results-based approach did not prevent delays or policy reversals.

During implementation, the Bank team could have been proactive in seeking collaboration with another ongoing project, Moldova e-Transformation. The objective of that project was to transform delivery of selected public services using information and communication technologies. Better synergies with that



project could have helped to mitigate one of the key weaknesses the ICR identified regarding government capacity to maintain the management information system for social support.

Quality of Supervision Rating

Satisfactory

Overall Bank Performance Rating

Moderately Satisfactory

9. M&E Design, Implementation, & Utilization

a. M&E Design

The PAD was clear on how the project activities were to contribute to each outcome indicator and constructed results chains for each results area, but not for the entire project. The Project Operations Manual provided detailed guidelines on the sources of data, data collection methods, and expected results in each results area for both the results-based and traditional financing components. The results framework, however, had too many indicators at the output and intermediate outcome levels. At the design stage, perhaps, the team could have been more selective in the choice of indicators. The MLSPF was responsible for the implementation of the project and data collection and used a management information system to monitor the performance of the AS and Heating Allowance programs.

b. M&E Implementation

The M&E framework was implemented effectively, and most of the key data were collected and reported as planned, especially for the results-based component. Because disbursements required verified evidence of achievement of the DLIs, the MLSPF was required to comprehensively monitor and report the results. The Project Operational Manual detailed the protocols for data collection and certification of each DLI. An external evaluation also was conducted to provide evidence on the program's effectiveness. To collect data on most of the outcome indicators, the project used the nationally representative Household Baseline Survey run by the National Statistics Bureau.

The reporting on few indicators in the ICR was inconsistent with that in the PAD. For example, the PAD defined "*spending on categorical benefits reduced by 30% of the pre-reform level of MDL771 bn in 2010,*" which assumes that the baseline was the share of categorical benefits in the total package of social benefits. The ICR, however, reported on the share as a percentage of GDP. There might have been issues of validity or measurability of this indicator, but the ICR did not discuss this issue.



Data collection and reporting on outputs and intermediate outcomes under the technical assistance component (component 2), which was structured as traditional financing, was weak. While the Project Operations Manual provided details on how each of those indicators should be monitored, the ICR provided no or incomplete information on many of the intermediate outcome indicators related to administrative and governance efficiency listed in the PAD, such as the percentage of inspectorates that received training, strengthening of social assistance policy M&E capacity in the MLSPF, conducting of a communications campaign, or the share of SADs compliant with service delivery standards (PAD, Annex 2, pp. 40-42). Instead, the ICR provided the list of procured services and goods only.

c. M&E Utilization

The team used monitoring and reporting on key indicators when supervising the project. As planned, DLIs were used to trigger disbursements, and the team proactively adjusted some of those DLIs to improve project implementation. To provide evidence on the achievement of outcomes, the team used data from the National Statistics Bureau, as noted above.

M&E Quality Rating

Substantial

10. Other Issues

a. Safeguards

There were no environmental issues related to this project, and no safeguard policies were triggered. At appraisal, the project was classified as environmental category C, requiring no environmental assessment.

b. Fiduciary Compliance

The ICR reported that both procurement and financial management of the project were adequate and followed World Bank requirements. These functions were carried out by the MLSPF, which was appropriately staffed. The team prepared detailed financial management plans for each component. There was a minor issue related to financial accounting software that was promptly corrected by the implementing agency.

The Project Operations Manual had a detailed procurement management plan. Most procurement activities were funded under the technical assistance component. The procurement and contracting procedures and



processes followed by the project were periodically reviewed by the World Bank and were found to be in compliance with the provisions of the Financing Agreement and applicable guidelines.

c. Unintended impacts (Positive or Negative)

The ICR relied on the AS program evaluation to explore unintended impacts. The external evaluation found a strong and significant impact of the AS in reducing the sale of assets, which is a negative coping strategy whereby people are forced to sell assets to meet their basic needs, thus compromising their future ability to escape from poverty. Moreover, the qualitative interviews also suggest that the AS may have helped reduce child abandonment.

d. Other

The project benefited the Roma population by targeting the poorest quantile of the population. According to ICR, the project also supported creation of a National Poverty Council as a platform to build consensus on social assistance reforms among various stakeholders, including representatives of civil society. The project's management information system investments strengthened the grievance redress mechanism to collect citizens' feedback on social safety net performance.

The project did not have any specific gender-related targets or objectives but collected gender-disaggregated data on recipients of the AS and Heating Allowance programs. The data showed that the percentage of women benefiting from both programs increased over the project period.

11. Ratings

Ratings	ICR	IEG	Reason for Disagreements/Comment
Outcome	Moderately Satisfactory	Moderately Satisfactory	---
Bank Performance	Satisfactory	Moderately Satisfactory	The political sensitivity of social assistance reforms in a highly unstable political environment was underestimated, and the proposed mitigation measures were insufficient, eventually affecting the project outcome.
Quality of M&E	Substantial	Substantial	---
Quality of ICR		Modest	---



12. Lessons

The ICR (p. 26) provided three lessons on the project and reiterated (in an annex) a number of important technical lessons from the evaluation of the Ajutor Social program. This ICR review partially concurs with two of those lessons and takes them one step further.

- Results-based financing allows flexibility to maintain implementation of social safety net reforms in the period of political change, but it cannot serve as a safeguard against major policy reversals that can alter the overall reform trajectory.
- The sustainability of investment in management information systems requires high levels of capacity building. Better coordination and synergies between World Bank projects and implementing agencies can improve the likelihood of achieving and sustaining results.

13. Assessment Recommended?

Yes

Please explain

It may be worth to assess Moldova's social safety net programs two years after the closure of this project to understand the extent to which the policy reforms have been resilient to forthcoming political changes in 2019.

Another useful undertaking could be to conduct a PPAR of SSN projects implemented in similar political contexts, to learn lessons on how to better overcome the challenges in sustaining reform gains.

14. Comments on Quality of ICR

The ICR was clear and followed guidelines. It usefully constructed an overall theory of change for the project, using evidence from the evaluation of the AS program carried out by Oxford Policy Management in 2016. There were some shortcomings in the analysis, such as lack of discussion of how results under the technical assistance component were achieved. In this respect, it is striking that two out of three project lessons are coming from the area (administrative and governance efficiency) where the ICR provided the least detailed evidence on achievement. The ICR could have gone further to explore more the results in this area and why some of them did not materialize. In addition, the ICR was unnecessarily repetitive and did not define



some key concepts and terms (Nominative Compensation, categorical benefits, the Fund for Social Support of the Population).

The ICR's conclusion that "using a combined investment and results-based instrument for financing medium term social assistance reform was appropriate" (p. 26) was also not well supported, at least in Moldova's politically unstable situation. To what extent did the use of DLIs, which aimed to provide incentives for timely implementation, prove to be effective for pursuing policy change in a politically sensitive area? From a reform perspective, there could be a downside to extending the implementation of policy changes over such a long period of time in a country with frequent government changes. Slow implementation may create "reform fatigue," and frequent government changes may mean frequent staff turnover, lower institutional memory, and less incentives to carry forward the policy changes started by the predecessor government.

The self-evaluation of this project could have also benefited from a candid discussion of the impact of DLIs on the project's internal efficiency. Getting the borrower's feedback on the use and reporting of DLIs may have provided useful lessons on the transaction costs of having such a detailed M&E framework.

a. Quality of ICR Rating

Modest