



Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 16-Oct-2018 | Report No: PIDISDSA25692



BASIC INFORMATION

A. Basic Project Data

Country Afghanistan	Project ID P166978	Project Name Tackling Afghanistan's Government HRM and Institutional Reforms	Parent Project ID (if any)
Region SOUTH ASIA	Estimated Appraisal Date 21-Oct-2018	Estimated Board Date 20-Dec-2018	Practice Area (Lead) Governance
Financing Instrument Investment Project Financing	Borrower(s) Islamic Republic of Afghanistan	Implementing Agency Independent Administrative Reform and Civil Service Commission	

Proposed Development Objective(s)

To strengthen the capacity of selected line ministries and agencies through merit-based recruitment of key positions, improved personnel management, and better HR planning.

Components

- Component 1: Human Resource Capacity Injection
- Component 2: Personnel and Payroll Management
- Component 3: Support to Administrative Reforms

PROJECT FINANCING DATA (US\$, Millions)

SUMMARY

Total Project Cost	75.00
Total Financing	75.00
of which IBRD/IDA	25.00
Financing Gap	0.00

DETAILS

World Bank Group Financing



International Development Association (IDA)	25.00
IDA Grant	25.00

Non-World Bank Group Financing

Trust Funds	50.00
Afghanistan Reconstruction Trust Fund	50.00

Environmental Assessment Category

C-Not Required

Decision

The review did authorize the team to appraise and negotiate

Other Decision (as needed)

B. Introduction and Context

Country Context

- 1. Development outcomes in Afghanistan have improved substantially since 2001, particularly in expanded access to basic services such as water, sanitation, electricity, education and health.** However, growing insecurity is putting these gains at risk. Between January and June 2018, 1,692 civilians were killed – the most since systematic documentation began in 2009.¹ Internal displacement has also increased substantially: in the first half of 2017 more than 200,000 people were displaced internally due to conflict and more than 296,000 refugees returned from Iran and Pakistan. In the context of this conflict, business and consumer confidence has stagnated. Annual economic growth is projected at 2.6 percent in 2017, increasing slightly from the 2.2 percent recorded in 2016. While this constitutes a moderate improvement compared to 2014 and 2015, economic growth has remained below population growth, resulting in a decline in real per capita output. Growth is expected to edge up to 3.2 percent in 2018, assuming no further deterioration in the security environment. In the medium term, real growth is expected to remain muted, increasing modestly to 3.6 percent by 2020.
- 2. The poverty rate in Afghanistan increased from 36 percent in 2011/12 to 55 percent in 2016/17.** The poverty rate is expected to remain high in the medium-term, due to weak demand for labor and security-related constraints on service delivery. Rural poverty and living conditions are particularly dire. The unemployment rate is estimated at 22.6 percent. Unemployment is particularly severe amongst women, low-skilled and illiterate workers. With an average annual population growth rate of 3 percent and with an estimated 400,000 Afghans entering the labor market each year, much higher economic growth is required to improve per capita incomes and to provide quality employment opportunities for the expanding

¹ Afghanistan Protection of Civilians in Armed Conflict Midyear report 2018, United Nations Human Rights <https://unama.unmissions.org/protection-of-civilians-reports>.



workforce.

3. **Stronger growth will require improvements in security, political stability, and administrative efficiency as well as stable aid flows.** Growth could also be enhanced with the right combination of fiscal and policy reforms, improvement in budget execution, and a reorientation of budget expenditures towards labor-intensive and community-based programs that directly reach the population with the greatest needs and with the highest marginal propensity to consume.

Sectoral and Institutional Context

4. **The size of the Afghan civil service has almost doubled since 2002, putting a substantial burden on the national budget.** The non-security sector grew from approximately 200,000 personnel in 2002 to 400,439 employees in 2017. This growth has primarily been the result of teacher recruitment which accounted for 82 percent of the net change over this period. The cost of wages and salaries of the government, including the security sector, grew to 43.7 percent of total of total expenditure by 2018 mid-year review (44.2 percent in initial budget), limiting fiscal space for operational and capital expenditures.
5. **Despite the growth in the size of the public administration over the last 15 years, few civil servants have adequate educational qualifications, especially at the sub-national level.** In addition to a low education and skill level in the overall labor force, public sector recruitment processes, particularly for senior (Grades 1 and 2) appointments, are often vulnerable to political intervention and bargaining. These vulnerabilities have also contributed to limiting gender equity in civil service recruitments. Although lower availability² of candidates is a factor, there is strong anecdotal evidence of qualified female candidates being excluded from heavily male-dominated processes. This often discourages women from applying to public sector positions, especially at the senior level. To mitigate these traditional gender barriers, the original Civil Servants Law of 2008 (*revised in April 2018*) introduced a clause barring gender-based preference in any form. This inadvertently prohibited the potential for creative solutions to increase female employment. The impact of these various constraining factors reflects in headcount data³ in which women account for approximately 22.6 percent of the civil service workforce, and just 7.3 percent of senior positions. However, participation levels vary significantly between line ministries and independent agencies (LMAs)**Error! Reference source not found.** For instance, while women are generally underrepresented, they comprise the majority of the Ministry of Women's Affairs (MoWA, 57 percent) and the Ministry of Labor, Social Affairs, Martyrs, and the Disabled (MoLSAMD, 62 percent). More broadly, 26.8 percent of females participate in the labor force as compared to 80 percent of men. Within this small employed population, only 10.3 percent of female labor is in salaried positions⁴. This suggests that female participation in the civil service, despite its low level, continues to remain an important anchor for formal sector salaried employment.
6. **The establishment control system (*Tashkeelat*) is also a constraint on the efficient allocation of human resources, inhibiting prioritization of resources to policy objectives.** The *Tashkeel* is largely the result of historical staffing patterns. Instead of restructuring the *Tashkeel* to meet evolving needs, the tendency has been to add more positions without eliminating unneeded ones, as political economy considerations make

² According to the Afghanistan Living Conditions Survey (ALCS) of 2016-17, 4.8 percent of women aged 18-22 are enrolled in tertiary education, as compared to 14.9 percent of males.

³ National Statistics and Information Authority (NSIA) Statistical Yearbook, 1396 (2017)

⁴ Afghanistan Living Conditions Survey (ALCS), 2016-17



such reforms more challenging. As a result, the supply of staff is often not well aligned with the demand for the delivery of services, particularly in provinces.

7. **Compounding this problem is the continued use of fragmented and mostly manual payroll verification systems.** It can be difficult to assess the actual grade and step of active civil servants⁵ and to validate their identities, increasing vulnerability to misuse of public funds and adding to concerns regarding 'ghost' employees⁶ (especially teachers) or inaccurate payments. The lack of a functional Human Resource Management Information System (HRMIS) also continues to obstruct efforts to automate payroll in the Afghanistan Financial Management Information System (AFMIS).
8. **The Pay and Grading (P&G) scales introduced in 2008 brought form and structure to the civil service, but also constrained career growth in technical and professional areas.** As the system is differentiated only by grade and not based on technical skill, it has restricted the career progression of technical staff and, correspondingly, pay progression. Professionals such as engineers or doctors struggle to move beyond the mid-point of the grade scale regardless of seniority or ability, since upper grades are restricted to management staff. Civil service pay is also affected by limited flexibility. Salaries cannot be adjusted for special circumstances, such as areas with higher levels of insecurity.
9. **Meanwhile, the real base pay of civil servants has significantly declined since 2008.** The P&G salary scale set in nominal terms has never been adjusted.⁷ While Cabinet has the authority to increase rates of pay, there is currently no central entity responsible for regularly reviewing salaries, identifying costs, and proposing changes within the medium-term fiscal framework. While the median public sector pay is higher than some non-governmental sectors, 39.8 percent of households headed by a salaried public sector worker fell below the poverty line according to the 2016-17 Afghanistan Living Conditions Survey (ALCS).
10. **To offset declining real base pay, special allowances, overtime and other ad hoc arrangements have been used inconsistently across ministries.** Aggregate expenditure on civilian salaries and allowances in 2016 was approximately AFN 65.84 billion (US\$969 million), of which allowances and overtime were approximately 36.3 percent. The complexity of these arrangements can lead to abuse and weaken oversight. This is particularly the case with overtime arrangements that are largely unsupervised and have for example been used extensively within the Ministry of Education (MoE) (AFN 3.6 billion or approximately US\$53 million), including to pay contracted teachers. This dysfunctional system has also led to increased wage compression between pay grades. In the education sector, it has led to calls for seniority-based progression to higher pay grades, undermining the position-based principles of P&G reform. Under the Super Skills allowance scheme, approximately 4,270 civil servants currently receive salaries of anywhere between US\$300 and US\$1500 per month. This scheme is unregulated and has been highly vulnerable to abuse and conducive to patronage.
11. **Donor-funded technical assistance has helped to address short-term capacity gaps but has contributed to**

⁵ For example, there are significant divergences in the distribution of Ministry of Education (MoE) employees by grade between the IARCSC's *Tashkeel* registry and the MoE's payroll data with the IARCSC record showing 83,064 MoE employees at Grade 6 compared to 114,813 in the MoE payroll data.

⁶ When the Afghanistan Reconstruction Trust Fund (ARTF) Supervisory Agent conducted physical verification of government employees over 25 provinces, about a quarter of the employees were absent from work on the day of the verification visits. Of these nearly a third should not have been on the government payroll at all as these turned out to be individuals who no longer worked for the government (deceased, retired, resigned, terminated). The payroll data also included many employees who had been transferred to other posts.

⁷ For example, a nominal salary of AFN 12,000 in 2008 had an equivalent real value of only AFN 8,426 in 2017 when using year-on-year CPI to adjust for purchasing power.



keeping talented staff beyond the reach of the public sector. In the context of weak public sector capacity, many donor-funded programs have hired non-civil service staff (known as a “parallel civil service”) to support urgent development objectives. Approximately 20,141 National Technical Assistance (NTA) contracted staff and advisors are employed by government through on-budget donor financing and from own development budget. An additional 8,000 advisors are estimated to be employed off-budget.⁸ NTA has often been used to directly administer core government functions rather than building long-term state capacity, limiting ownership and accountability of policy reform. With NTA salaries generally between 8-10 times higher than comparable grades in the core civil service⁹, the drawdown of external aid¹⁰ places the sustainability of these positions at increasing risk.

12. **Moreover, while P&G is the predominant scale for the core civil service and the NTA for donor-funded staff, over ten different pay scales are also in use across the public sector.** This not only undermines the principle of equal pay for equal work but contributes to fragmentation and lack of transparency of the overall civil service that makes effective management and control of the wage bill difficult. There is a growing trend of over-reliance on international consulting assignments. The value of this support is questionable with international consultancy fees in Afghanistan amongst the highest in the world, yet many assignments are utilized for routine activities rather than being strategically assigned or responsive to critical gap areas requiring specialized international expertise.
13. **To address these challenges, the World Bank has been providing financing for salaries at the higher NTA rates through the Capacity Building for Results (CBR) Facility (P123845) since 2012.** CBR finances the hiring of key vacant or filled civil service positions requiring upgrade in responsibilities and/or performance. CBR appointees are appointed as permanent civil servants rather than as a ‘parallel’ capacity. However, CBR appointees are paid salaries on the NTA pay scale, which is between 8 to 10 times the regular civil service salary scale. To date, 929 appointees have been recruited under CBR. This approach has been used to build accountability and policy ownership by government. The CBR facility encountered significant implementation challenges in the recruitment and placement process, while external financing of these positions has also created a sustainability challenge. The experience of CBR and its framing within the broader sectoral and institutional context is discussed throughout this document and has closely informed the design of the Tackling Afghanistan Government’s HRM and Institutional Reforms (TAGHIR) Project.

C. Proposed Development Objective(s)

Development Objective(s) (From PAD)

To strengthen the capacity of selected line ministries and agencies through merit-based recruitment of key positions, improved personnel management, and better HR planning.

⁸ There has been no systematic tracking of such data due also to the difficulty to monitor off budget NTA.

⁹ According to AFMIS data, on-budget NTA (equal to just 5 percent of the entire non-uniform civil service) cost (US\$212 million) more than a quarter of the annual cost of the core civil service (US\$800 million) in 2017 and roughly comparable to the total base salaries for teachers (US\$256 million).

¹⁰ External aid has declined following the gradual military withdrawal of international forces, and it is expected to fall even further in the coming years, to about 25 percent of GDP by 2018. Afghanistan Systematic Country Diagnostic (SCD), World Bank, 2015.



Key Results

14. The PDO Level Indicators for TAGHIR are as follows:

- CBR/TAGHIR civil servant positions appointed in priority LMAs. (Number)
 - Female CBR/TAGHIR civil servants appointed in priority LMAs. (Number)
- CBR/TAGHIR civil servant positions in priority LMAs transitioned from project to core government budget financing (% of total).
- Priority LMAs that meet minimum benchmark targets related to reduction in number of NTAs (Number).
- HRMIS/Payroll rolled-out in at least 5 LMAs. (Number)

D. Project Description

15. TAGHIR includes the following three mutually reinforcing components:

- (a) **Component 1: Human Resource Capacity Injection (US\$54 million).** This component will provide financing for a capacity 'surge' to support the government in the delivery of its key policy priorities. The component will support a total of up to 1,500 new (TAGHIR) and 'legacy' (CBR) civil servant positions *at any one time*. Within this ceiling, the financing of new positions will be restricted to 15 priority LMAs pre-determined based on their direct contribution to economic growth and development outcomes (revenue generation and service delivery). 'Legacy' appointees recruited under the CBR project will be financed within the 15 priority LMAs as well as 4 other pre-identified priority LMAs for which TAGHIR will not finance new appointments. Project financing of new and 'legacy' appointments within priority LMAs is restricted to a total period of two years *from date of appointment*, with the recruitment of new positions to be completed by no later than December 31, 2019. TAGHIR will also provide financing of 'legacy' CBR appointees in non-priority LMAs for a maximum period of one year *from project effectiveness*, with financing progressively phased out by the end of 2019. As project financing of non-priority LMA 'legacy' positions end, the respective LMAs may require, as part of the mid-year budget review, to explore the option of on-budget financing of the positions affected.
- (b) **Component 2: Personnel and Payroll Management (US\$15 million).** This component will strengthen establishment control and personnel management and contribute to more reliable payroll management. The key activity for which financing will be provided is building a functional HRMIS with biometric civil servant enrollment, grounded in business process review. The HRMIS will be integrated with payroll, AFMIS, and e-Payment Systems. This integration will provide substantial improvements in the control of positions, personnel numbers, and budgeted costs, while monitoring and limiting LMA-level discretion for allowances and overtime. Organizational structures would be linked to the functions of LMAs and would clearly identify the level of each position and job responsibilities. It would also facilitate monitoring of gender targets to address staffing imbalances.
- (c) **Component 3: Support to Administrative Reforms (US\$6 million):** This component will provide financing for outsourced operational support, including the services of a Third-Party Monitor (TPM) to verify the application on TAGHIR appointments of correct procedures and selection criteria within government



systems. The component will not finance a project implementation unit as IARCSC will directly manage TAGHIR. Discrete, specialized and primarily international consultant led technical assistance activities, in support of implementation of key administrative reforms will also be supported. These are planned in complement to and reinforcing of an ongoing World Bank Advisory Services and Analytics (ASA) program – the Public Administration Reform ASA (PASA, P164594).

E. Implementation

Institutional and Implementation Arrangements

16. **Oversight of TAGHIR at the strategic level will be institutionalized within the High Council for Reforms and Good Governance.** The High Council, under the Chairmanship of the President of the Government of the Islamic Republic of Afghanistan (GoIRA) and comprised of the IARCSC Chairman and relevant Cabinet ministers including the Minister of Finance, will provide oversight of public administration and civil service reforms more broadly, and within this context will provide strategic oversight of TAGHIR. This will ensure the sustainability, ownership and enhance the weight and broader relevance of project decision making.
17. **At the operational level, the project will be managed and coordinated by the Board of Commissioners of the IARCSC.** This is led by the IARCSC Chairman and is currently comprised of 8 Commissioners. The project will be directly implemented by IARCSC through its core functions – without the use of a Project Implementation Unit (PIU). IARCSC is well-positioned to assume this responsibility given its built-up experience in managing CBR under which a transition plan to a ‘no-PIU’ arrangement is already in process. Technical interventions under TAGHIR would be led by the relevant IARCSC General Directorates in coordination within IARCSC and with LMAs (where relevant). Per the Amended Civil Servants Law (2018), the independent Civil Service Appointments Board (CSAB), and Civil Service Complaints Board (CSCB) housed within IARCSC will respectively handle appointments and complaints related to new Grades 1 and 2 appointments (Component 1), working closely with hiring LMAs, and will oversee direct LMA recruitment and any associated complaints related to new Grade 3 positions. As part of the transition to a ‘no-PIU’ arrangement, CBR PIU HR specialists have been transferred to CSAB and now report directly to the CSAB Commissioners as opposed to the project. Independent verification of project-financed appointments will be carried out through a TPM (to be availed through Component 3). The HRMIS Department of the Civil Service Management Directorate (CSMD) will lead the development, implementation, roll-out, and integration of HRMIS/Payroll (Component 2), in coordination with key stakeholder. CSMD will also carry primary responsibility for technical assistance related to the implementation of key administrative reforms (Component 3).
18. **Administration and fiduciary of TAGHIR will be carried out by the relevant departments of the IARCSC's General Secretariat** – the Administrative Reform Secretariat (ARS). ARS will be responsible for project financial management, procurement and contract management, human resources, M&E and communications. ARS directorates have previously been assessed by the Bank, and through its engagement in CBR, it has prior experience of handling World Bank funded/administered projects. CBR PIU Procurement and Administration staff are currently in process of being moved into ARS core *Tashkeel*, as part of the transition to ‘no-PIU’ arrangement, buttressing ARS's capacity to directly manage TAGHIR shared services and fiduciary compliance. This staff has been assessed as satisfactory by the Bank and received procurement and financial management training on World Bank procedures and requirements, including on the World Bank's new Procurement Framework, and on Interim Unaudited Financial Report (IUFR) based



replenishment. The Bank will continue to provide needed fiduciary assistance and capacity support throughout the life time of the project.

F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

The project will facilitate activities related to Human Resource Management (HRM) and institutional reforms. These will be targeted in the headquarters (Kabul) and provincial offices of the Independent Administrative Reform and Civil Service Commission (IARCSC) and other key line ministries and independent agencies. Project activities will not involve physical infrastructure or civil works.

G. Environmental and Social Safeguards Specialists on the Team

Shankar Narayanan, Social Specialist
Mohammad Arif Rasuli, Environmental Specialist

SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	No	Given the nature of proposed project scope, no environmental and social safeguards impacts are foreseen.
Performance Standards for Private Sector Activities OP/BP 4.03	No	N/A
Natural Habitats OP/BP 4.04	No	Given the scope and overall objective of the program this policy is not triggered.
Forests OP/BP 4.36	No	Given the scope and overall objective of the program this policy is not triggered.
Pest Management OP 4.09	No	Given the scope and overall objective of the program this policy is not triggered.
Physical Cultural Resources OP/BP 4.11	No	Given the scope and overall objective of the program this policy is not triggered.
Indigenous Peoples OP/BP 4.10	No	There are no indigenous people in the project area as defined by OP/BP 4.10.
Involuntary Resettlement OP/BP 4.12	No	The project is not expected to have any land/asset impact as no civil works will be undertaken under this project. The project work consists of activities related to HRM and institutional reforms. Therefore, OP/BP 4.12 is not triggered.



Safety of Dams OP/BP 4.37	No	N/A
Projects on International Waterways OP/BP 7.50	No	N/A
Projects in Disputed Areas OP/BP 7.60	No	N/A

KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

None of the World Bank’s safeguard policies are triggered. Transition of ‘legacy’ Capacity Building for Results (CBR) Facility positions in non-priority Line Ministries and Independent Agencies (LMAs) by end-2019, as well as of new and existing positions in priority LMAs – all of whom are permanent civil servants – will not entail loss of employment but graduation to direct government financing of these positions. New recruitment will prioritize vacant positions; with positions held by permanent incumbents only re-advertised in the event of underperformance and/or a significant upgrade in Job Description, as determined by the Civil Servants Law (No. 951 of 2008; Amended in 2018). Incumbents are unrestricted in re-applying within the meritocratic process overseen by the Independent Administrative Reform and Civil Service Commission (IARCSC) Civil Service Appointments Board (CSAB) and verified by Third-Party Monitor and periodic ex-post Bank review; with recourse for formal appeal to the IARCSC Civil Service Complaints Board (CSCB) in the case of dispute. In the event of non-selection of incumbent, separation provisions will apply, as stipulated in the Civil Servants Law and Labour Law (No. 35 of 2007). Consequently, limited potential negative social impacts are expected; for which requisite mitigation and management through internal government regulations, processes, and structures preside and supersede. The project therefore has a safeguards risk rating of “Category C”.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area: The project will facilitate activities related to Human Resource Management (HRM) and institutional reforms, and therefore does not include any physical works that could have potential and/or long terms environmental or social impacts.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts. New recruitment supported under TAGHIR will to the extent possible prioritize vacant civil service positions; with positions held by permanent incumbents only re-advertised in the event of underperformance and/or a significant upgrade in Job Description, as determined by the Civil Servants Law (No. 951 of 2008; Amended in 2018).

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described. IARCSC has engaged with the World Bank over many years in the implementation of predecessor capacity injection programs and projects. The current proposed project will not support physical infrastructure and civil works and therefore not trigger environmental safeguard policies. Moreover, limited potential negative social impacts are expected, and for which requisite mitigation and management through internal government regulations, processes, and structures preside and supersede. The project will further support IARCSC’s capacity on and systems for functional Grievance Redress Mechanisms (GRM). IARCSC adopted a project-specific GRM for CBR which it will continue to



maintain for the purposes of planned TAGHIR interventions. Under this mechanism, project-specific complaints, including those lodged anonymously, are formally registered, followed-up and responded to by IARCSC. Recruitment compliance under TAGHIR is planned to be further supported through a Third-Party Monitor responsible for verifying the application of correct procedures and selection criteria within government systems. Beyond the project, IARCSC manages several other broader GRMs. Importantly, it houses the independent CSCB which CBR and external partner support has helped to improve appeal and complaints' handling processes over the last year. IARCSC-at-large – through a legally binding procedure – is further responsible for addressing grievances of all civil servants that cannot be dealt with at LMA level or through the IARCSC's CSCB. Overall, IARCSC's grievance redress performance has substantially improved over the last year, with IARCSC now handling over 8,000 complaints each year. The project will support other citizen engagement measures, including hearings to engage the public on project interventions and progress. Weekly public hearings, wherein the IARCSC Chairman and Commissioners provide updates on ongoing and planned administrative reforms and directly receive complaints, will be utilized for this purpose. IARCSC publishes an annual progress report which includes updates on CBR and on the number of complaints received, handled and addressed. It will continue to do so for TAGHIR.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

The key project stakeholder is IARCSC. The Bank has consulted with IARCSC around the functionality of its existing GRM system and other citizen engagement measures, especially those related to appointments and appointment complaints.

B. Disclosure Requirements

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)

The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank for disclosure?

NA

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?

NA



All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?

NA

Have costs related to safeguard policy measures been included in the project cost?

NA

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?

NA

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?

NA

CONTACT POINT

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APPROVAL

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