Public Disclosure Authorized

Report Number: ICRR0021533

1. Project Data

Project ID P113488 Country Sri Lanka	LK: Tra	ct Name Insforming School Education Ce Area(Lead) Ion	n
L/C/TF Number(s) IDA-50370,TF-13267 Bank Approval Date 29-Nov-2011	30-Jun	g Date (Actual)	Total Project Cost (USD) 131,487,637.84
	IBRD/I	DA (USD)	Grants (USD)
Original Commitment	100,	000,000.00	39,110,485.00
Revised Commitment	138,238,112.59		39,110,485.00
Actual	131,487,637.84		39,110,485.00
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2. Project Objectives and Components

a. Objectives

According to the Project Appraisal Document (PAD, p. ii) and the Financing Agreement of May 18, 2012 (p. 5), the objective of the project was "to enhance access to, and quality of, primary and secondary education to provide a foundation for the knowledge-based economic and social development of the country."

- b. Were the project objectives/key associated outcome targets revised during implementation?
- c. Will a split evaluation be undertaken?
- d. Components

According to the PAD (p. 3), the project contained three themes that were based on the five-year national education sector rolling plan. The national sector plan consisted of the education sector plan of the central Ministry of Education (MoE) and the education sector plans of the nine Provincial Councils. These plans were prepared through a collaborative process of consultation and joint work between the MoE, the Provincial Councils, the Ministry of Finance and Planning, and the Finance Commission. The education sector plan sought to improve the efficiency and equity of education expenditures. The education sector rolling plans were to be updated every year jointly by the MOE and the provinces.

Theme One: Promoting Access to Primary and Secondary Education (appraisal estimate US\$30 million, which was completely disbursed): This theme was to finance initiatives to improve opportunities for children in the age group 6-10 years to complete primary education, and for children in the age group 11-16 years to complete secondary education up to grade 11. This theme was also to support the improvement of education opportunities for youth aged 17-18 years in grades 12-13. Flagship primary and secondary school learning environment improvement programs in 5,000 primary schools and 1,000 secondary schools were to be implemented. Demand-side incentives were to consist of tuition-free primary and secondary education in government schools; a set of free textbooks and school uniforms for children in grades 1-11; the appointment of school attendance committees in each local school community to promote school enrollment and attendance; and school health and nutrition programs, including meals for children from poor communities and sanitation facilities to promote attendance, especially among girls. Supply-side measures were to include ensuring the availability of a good quality primary school within easy reach of all primary school-aged children, and the availability of a good quality secondary school offering science, arts, and management curriculum streams within reasonable travelling distance for all students.

Theme Two: Improving the Quality of Education (appraisal estimate US\$50 million, which was completely disbursed): This theme was to assist the government to strengthen the quality of national assessments to international standards. The project was to support Sri Lanka in participating in international assessments such as the Trends in International Mathematics and Science Study and Program for International Student Assessment. The information and feedback from these national and international assessments were to be used by policy makers and technocrats in key areas such as curriculum development, pre-service teacher education, continuing teacher development, and the production of educational material including textbooks. The learning assessments were also to provide feedback to the Provincial Councils on the performance of education systems in the provinces.

Theme Three: Strengthening Governance and Delivery of Education Services (appraisal estimate US\$20 million, which was completely disbursed): This theme was to support the establishment of Programs for School Improvement (PSIs). Under the PSIs, school officials such as principals, teachers,

and administrators were to be joined by stakeholders in the local school community, including parents, past pupils, and well-wishers, in the management and administration of schools. The government was also to provide grants to schools to improve education outcomes, particularly to improve student learning, and for initiatives to strengthen the "soft skills" of students, such as team work, an industrious and disciplined work ethic, good communication skills, leadership, and enterprise, that are in demand by employers.

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

Project Cost: The project was estimated to cost US\$100 million. Actual cost was US\$131.48 million.

Financing: The project was to be financed by a US\$100 million credit from the International Development Association, of which US\$92.37 million was disbursed. The project also received a Trust Fund with an appraisal estimate of US\$39.11 million, which was fully disbursed. Also, during project implementation the project received funding from the Australian Government in the amount of approximately US\$8.4 million, which was disbursed in tranches. The project used results-based financing, and the disbursements were made against selected eligible expenditure programs. The actual credit disbursements were based on five disbursement-linked indicators (DLIs) that were identified in alignment with the themes of the government's national Education Sector Development Framework and Program overall ESDFP (2012-2016).

Borrower Contribution: No Borrower contribution was planned or made.

Dates: On June 6, 2017 the project was restructured to: i) Extend the closing date from June 30,2017 to June 30, 2018 to support the use of SDR 6 million in unused funds for the preparation and commencement of a new general education sector development program. These funds were unused due to a six-month delay in project effectiveness and cost savings due to the provision of an additional grant from the Australian Government in the amount of approximately US\$8.4 million; and ii) Revise the Results Framework. There were two changes in the results framework, neither of which impacted the project's objective or outcome targets: (a) additional targets were added for one intermediate outcome indicator ("the education sector plan," which was also to be a DLI for release of funds in the amount of approximately XDR 6 million during the extended period); and (b) two new intermediate outcome indicators, "the development of a framework for a School Inspectorate System" and "the development of an enhanced model of School-Based Management," were added.

3. Relevance of Objectives

Rationale

According to the PAD (p. 1), Sri Lanka's general education system had made important gains over the recent past, especially in basic education. For example, at appraisal the net primary education enrollment rate was 99 percent, and the primary education completion rate was over 95 percent. Also, gender parity was high in the education system, and learning outcomes in primary education in the first Language (Sinhala and Tamil), mathematics, and English had increased significantly between 2003- 2008. Over that time period, the proportion of students scoring over 50 percent in First Language rose from 69 percent to 81 percent, in mathematics from 65 percent to 80 percent, and in English from 31 percent to 49 percent. However, the education sector faced several ongoing challenges, including: i) insufficient focus in secondary education on developing the complex skills needed in the economy; ii) lack of mastery of various subjects for a large number of children at the primary level; iii) regional disparities in access and quality of education across provinces; iv) inadequate school infrastructure; and v) a need for the education system to inculcate and foster a favorable environment for a multi-ethnic, multi-religious, and multi-cultural society.

The objectives of the project were in line with the government's national ESDFP at appraisal (2012-2016), which stressed the importance of promoting a high-quality general education system. The objectives of the project also supported the government's most recent ESDFP (2018-2025), which aims to improve the quality and governance of the education sector in order to provide students with the knowledge, skills, behaviors, and attitudes necessary to be successful in the 21st century economy. The objectives of the project were also in line with the Bank's most recent Country Partnership Framework (FY17-FY20), which identifies the strengthening of the education and training systems as a key pillar and stresses the promotion of equitable access and quality at the primary and secondary education levels.

Rating High

4. Achievement of Objectives (Efficacy)

Objective 1

Objective

Enhance access to primary and secondary education

Rationale

The project's theory of change linked supply-side measures such as flagship programs (to ensure that good quality primary school is available within easy reach of all primary school aged children, and that a good quality secondary school offering science, arts and management curriculum streams are available within reasonable travelling distance for all students) and non-formal and special education programs with enhancing access to primary and secondary education. Also, the project's theory of change linked demand-side measures such as tuition waivers, free textbooks, the appointment of school attendance committees in each local school community to promote school enrolment and attendance, school health and nutrition

programs (including meals for children from poor communities and sanitation facilities to promote attendance, especially among girls) with enhancing access to primary and secondary education.

Outputs

- The Education Sector Rolling Plan for FY17 was completed and is being implemented. The plan for FY18 has been drafted by the MoE and the Provincial Councils, achieving the target of the Education Sector Rolling Plan for FY17 being updated by the MoE and provinces.
- The flagship primary and secondary school learning environment improvement program was implemented in 5,000 primary schools and 1,000 secondary schools. The improvements to the learning environment of primary schools included providing adequate facilities for child-centered learning. The improvements to the learning environment of secondary schools included the provision of higher-order assets and spaces such as libraries, science laboratories, information technology centers, language laboratories, activity rooms, and multi-purpose rooms.
- Special education was upgraded, and non-formal education programs for children with special needs were continued. Over the entire project period, around 400 teachers and 900 principals received training in inclusive education, and a total of 164 training programs were delivered. The education programs included courses to obtain a diploma in special education and a diploma in sign language. According to data from the MoE, a total of 8,526 children with special learning needs were enrolled in special education programs that were implemented in all nine provinces. About 360 education instructors were trained in developing literacy skills, and 363 literacy programs were delivered to 12,051 youth.
- All schools were transformed into Health Promoting Schools, providing sanitation facilities and meals to children from poor communities to promote attendance, especially among girls, achieving the target.
- According to the ICR (p. 11), by 2016, School Management Committees (SMCs) were established and trained to promote student participation in 10,184 schools in 98 zones. SMCs implemented several actions to increase participation of students, such as monitoring attendance of students and following up with families whose children dropped out to bring them back to school. Also, the SMCs supported the preparation of mid-morning meals to promote participation in poor communities.

Outcomes

- The survival rate of students up to Grade 11 improved from 82 percent in 2011 to 88 percent in 2017, achieving the target of 88 percent.
- According to UNESCO data, between 2009 and 2016 the gross enrollment rate (GER) at the primary school level increased from 95.08 percent to 101.9 percent. The net enrollment rate (NER) at the primary school level increased, during the same time period, from 93.25 percent to 98.92 percent. The NER at the secondary school level increased from 84.09 percent in 2010 to 88.83 percent in 2017. The effective transition rate from primary to lower secondary general education increased from 98.5 percent in 2011 to

99.7 percent in 2015. These indicators were not part of the project's formal Results Framework, and therefore no targets were established.

Rating Substantial

Objective 2

Objective

Enhance the quality of primary and secondary education to provide a foundation for the knowledge-based economic and social development of the country

Rationale

The project's theory of change linked the revision and improvement of the primary education curriculum, the diversification and rationalization of the mathematics and science curricula for secondary education, the revision of textbooks with agreement on the quality of content and promotion of social cohesion, and the modernization and expansion of quality assurance mechanisms, with enhancing the quality of primary and secondary education.

Outputs

- A national assessment system to measure learning outcomes and improvements in test scores between comparable cycles was established, achieving the target. Findings of the national assessments were used by the MoE and the provinces to strengthen their activities, achieving the target. The National Education Research and Evaluation Center (NEREC) conducted the following assessments: i) grade 8 assessments (mathematics, science, and English) in 2012-2013, 2014-2015, and 2016-2017; and ii) grade 4 assessments (first language, English, and mathematics) in 2013-2014 and 2015-2016.
- School-based teacher development (SBTD) programs were implemented in all schools. In 2017, approximately 156,000 teachers (about 65 percent of the entire teaching workforce) were engaged in SBTD. According to Edu Stat, which is managed by the Data Management Branch of the MoE, in 2017 98 percent of 240,000 governmental school teachers across the entire country were professionally trained. According to MoE data, by the time of project closing 88 percent of 4,027 science teachers and 87 percent of 3,765 mathematics teachers across 1,005 secondary schools were professionally qualified.
- The primary education curriculum was revised and improved. For the secondary education level (grades 6 to 11), new mathematics and science curricula were introduced.

- All schools in all zones completed the program for school improvement (PSI) annual cycle, achieving the target. The ICR (p. 13) stated that these committees conducted awareness programs for school communities to promote participation and retention in primary and secondary education in all zones.
- A quality assurance program was developed and aligned with the PSI. It was evaluated in 2014, and an upgraded program was implemented in all schools across all nine provinces in January 2015. In addition, quality assurance guidelines were published.
- A framework for a school inspectorate system was developed, achieving the target.
- An enhanced model of school-based management was developed, achieving the target.
- Education sector audits were completed in a timely manner by the auditor's general department for both the center and provinces.
- All schools (approximately 10,100) implemented social cohesion programs through multiethnic student and teacher interactions. Textbooks were reviewed, and the quality of content and promotion of social cohesion was agreed on.
- A career guidance program was developed. This was a systematic program for career education (world of work) in grades 7 to 9 and the inclusion of career education modules as an integral part of the civic education syllabi in grades 7 to 9, achieving the target of this DLI. Over 2,300 teachers and 142 students received training in career guidance.
- Bilingual education to improve proficiency in an international language (English) was implemented. The Content and Language Integrated Learning (CLIL) approach (the teacher uses the second language as much as possible but the mother tongue when necessary) was introduced in 750 secondary schools and senior secondary (advanced level). 78,000 students and 7,000 teachers engaged in this method. The ICR (p. 16) stated that independent third-party evaluations verified that the DLI targets on CLIL implementation and teacher training were met each year.

Outcomes

- Between 2013 and 2015, the proportion of students achieving higher than 50 percent in grade 4 increased in mathematics from 70.2 percent to 73.4 percent, and in English from 47.2 percent to 55.5 percent. For grade 8 students, there are no significant changes in mathematics (49.5 percent in 2013 and 50.5 percent in 2015) or science (34.1 percent in 2013 and 34.2 percent in 2015), and a decline in English (from 29.6 percent to 21.3 percent).
- Although, the project lacked an indicator to measure that part of the objective (i.e. provide a foundation for the knowledge economy and social development of the country), it can be plausibly argued that the quality interventions will move the country closer to a knowledge economy and a more socially cohesive country.

Rating

Rationale

The project's activities were logically and plausibly connected to achievement in improving access to, and quality of, primary and secondary education, and its efforts in career guidance, social cohesion, and bilingual education were likely to have contributed to knowledge-based social and economic development of the country. The overall efficacy is rated Substantial.

Overall Efficacy Rating Substantial

5. Efficiency

Economic Efficiency

The PAD (p. 15) conducted a cost-benefit analysis which assumed that the project's investments would result in improvement in employment rates and earnings due to education quality improvement. A discount rate of 12 percent was used. The analysis estimated a Net Present Value (NPV) ranging from US\$359 million (low case scenario) to US\$429 million (middle case scenario) to US\$500 million (high case scenario). The project's Internal Rate of Return (IRR) ranged from 29 percent (low case scenario) to 33 percent (middle case scenario) to 38 percent (high case scenario). These results indicate that the project's investments were likely to achieve positive benefits.

The ICR (p. 41) conducted a cost-benefit analysis with similar assumptions as the PAD. The analysis estimated a NPV ranging from US\$357 million (low case scenario) to US\$469 million (high case scenario). The IRR ranged between 23.7 percent (low case scenario) to 30.4 percent (high case scenario). Even though the estimates in the ICR were lower than in the PAD, they still indicate that the project was a worthwhile investment.

Operational Efficiency

The ICR (p. 22) stated that the Bank's engagement, proactive follow-up on issues, and continuous supervision and support for the provinces had a positive impact on project implementation. However, the project's effectiveness was delayed by several months, resulting in the extension of the closing date by twelve months. According to the ICR (p. 22), the delay in project signing and effectiveness hampered implementation in the MoE and provinces, and initial project funds only reached the provinces in the fourth quarter of 2012. Also, the Mid-Term Review, which was conducted in September 2014, noted that the project's implementation

of the PSI program varied considerably across schools. Furthermore, the project lacked a communication strategy, and at the beginning of implementation coordination between departments in the MoE and between the MoE and provinces was weak. Coordination improved mainly because the directors of the relevant MoE branches made an effort to do so.

These implementation shortcomings are considered to be moderate, and the project's overall efficiency is 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 the project's objectives is rated High, given alignment with country conditions, government strategy, and the Bank's most recent Country Partnership Framework. Both objectives were rated Substantial. Efficiency was Substantial. These ratings are consistent with minor shortcomings in the project's preparation and implementation. Outcome is therefore rated Satisfactory.

a. Outcome Rating Satisfactory

7. Risk to Development Outcome

According to the ICR (p. 26), the government continues to be committed to the objectives of the project. This project is being followed by a new Bank operation (General Education Modernization Project, \$100 million,

2018-2024) that builds on its achieved outcomes, making their sustainability more likely. While institutional development mechanisms are in place to ensure the program's sustainability beyond Bank engagement, capacity is not the same across all zones and needs to continue to be strengthened in weaker zones. Also, even though the number of out-of-school children has significantly decreased, further efforts need to be made to attract the remaining out-of-school children.

8. Assessment of Bank Performance

a. Quality-at-Entry

According to the ICR (p. 25), the project was built on the Bank's experience with education projects in Sri Lanka and other countries. International best practices such as school autonomy, community-led accountability, and SBTD were taken into account, as were the findings of the Bank's 2011 analytic work *Transforming School Education in Sri Lanka: From Cut Stones to Polished Jewels*.

The Bank team conducted extensive consultations during project preparation with various stakeholders at all levels. In addition, the project was aligned with the government's development priorities in the education sector as well as those of other partners. Identified risk factors included insufficient capacity in some of the provinces, the complexity of the organizational structure with a decentralized system of service delivery and separate channels of financing and implementation, and the possibility of opposition to initiatives intended to promote social cohesion through increased interactions between students and staff from different ethnic and religious groups. Mitigation efforts included organizational strengthening through capacity building, and empowering policy makers to highlight the importance of social inclusion. The ICR (p. 26) stated that mitigation measures were adequate.

According to the ICR (p. 22), the project's effectiveness was delayed by several months due to lack of awareness of the Bank's conditions among some legal officials.

Quality-at-Entry Rating Satisfactory

b. Quality of supervision

According to the ICR (p. 26), the project benefited from the continuity of having the same Task Team Leader throughout project preparation and implementation. Also, the Bank team included the appropriate skill mix and conducted a total of ten supervision support missions, including visits to all the project provinces in addition to bi-monthly review visits with the Operations and Monitoring Support Unit (OMSU) and Australian Department of Foreign Affairs and Trade (DFAT) to selected schools, divisions, and zones.

Quality of Supervision Rating Satisfactory

Overall Bank Performance Rating Satisfactory

9. M&E Design, Implementation, & Utilization

a. M&E Design

The theory of change was sound, as were the linkages between key project activities and intended outcomes was sound. The project's objectives were clearly specified. Most indicators had a baseline and target. In addition to the indicators included in the Results Framework, the project included five DLIs. However, it was an important shortcoming that the Results Framework did not include PDO- and intermediate-level results indicators to measure all aspects of the PDO statement. For example, the Results Framework did not include any indicators to measure the last part of the PDO "to provide a foundation for the knowledge-based social and economic development of the country." Also, the PDO indicator to measure enhanced access -- survival through grade 11 -- was incomplete to measure access to both primary and secondary education. The ICR provided some additional measures outside the results framework (for instance, the number out of school children) to remedy this shortcoming.

The OMSU was established at the Ministry of Local Government and Provincial Councils (MLGPC) and was responsible for the project's M&E in cooperation with the MoE, provincial councils, and National Institute for Education. A M&E specialist within OMSU was to be responsible for consolidating quarterly monitoring reports on key performance indicators. However, the ICR (p. 23) stated that this position was not always filled.

b. M&E Implementation

According to the ICR (p. 23), data were collected through various sources such as project monitoring checklists, annual school census, public examinations, and national assessments of learning outcomes. Project monitoring was conducted at the national level by the MoE and the Bank and at the provincial level by the MLGPC and provincial education authorities. In addition, the Bank conducted bi-monthly progress review visits with the OMSU and the Australian DFAT to selected schools, divisions, and zones.

During the project restructuring in June 2017, the Results Framework was revised to add two additional intermediate results indicators, and additional targets were added for one intermediate outcome indicator. However, these revisions did not add sufficient indicators for complete measurement of all three objectives. The ICR team had to bring in additional data at the ICR stage in order to assess achievement fully.

The ICR (p. 23) stated that evaluation activities were also contracted out to the National Education Research and Evaluation Center, an independent research agency. Some third-party evaluations were conducted by the Sri Lanka Association for the Advancement of Education Development, and these results were regularly communicated to relevant officials. According to the Bank team (February 25, 2019), the third-party verifications found the M&E data to be reliable and of good quality. The project's M&E functions and processes are being used for a Bank-financed follow-on project (General Education Modernization Project, \$100 million, 2018-2024).

c. M&E Utilization

The ICR (p. 23) stated that M&E data from various entities was shared and used at the provincial and central level to inform decision making and strengthen the implementation of project activities.

M&E Quality Rating Modest

10. Other Issues

a. Safeguards

The project was classified as environmental assessment category B and triggered the Bank's safeguard policy OP/BP 4.01 (Environmental Assessment). According to the ICR (p. 24), the project did not cause any significant and/or irreversible environmental impacts. The Bank team stated (February 25, 2019) that the project complied with the Bank's safeguard policies. New construction was not permitted in environmentally sensitive areas such as wetlands, marshes, or forests. Also, the government decided to progressively move away from using asbestos-cement for construction purposes due to its toxicity. Original construction plans were modified to accommodate this decision, and the Bank and OMSU consultants monitored compliance during their bi-monthly provincial visits. The project did not trigger any social safeguard policies. The ICR (p. 24) stated that a social audit was conducted in May 2016 and did not find any major compliance issues, but it recommended strengthening community participation in the project.

b. Fiduciary Compliance

Financial Management

According to the ICR (p. 25), the OMSU and MoE collected financial information from spending units and provinces on a monthly basis. Bi-annual interim unaudited financial reports were issued in accordance with the Project Operations Manual. In addition, annual consolidated financial statements were prepared based on the annual appropriation accounts of the MoE, the nine provincial education ministries, and nine provincial education departments. These statements were submitted to the Auditor General for external audit.

The ICR (p. 25) stated that from 2012 to 2016 audits were conducted by the Auditor General, and audit reports were submitted with occasional delays. Issues that were identified in these audits were addressed by the government, resulting in favorable opinions by the Auditor General. The project's audit report for 2016 was delivered in June 2017 and had a favorable opinion. According to the Bank team (February 25, 2019), the four most recent audit reports (i.e. for FY 17, FY 16, FY 15 & FY 14) received for both MoE & MPCLG had unqualified opinions. There were instances of qualified opinions for some of the project's initial years, but these did not reflect any serious observations or accountability issues on financial management aspects pertaining to the project.

Procurement

According to the Bank team (February 25, 2019), the project followed the Bank's procurement guidelines, and the project did not encounter any major procurement issues. Early in the project, there were capacity constraints in some provinces. The Bank and the procurement specialist in the MPCLG conducted regular training sessions for provincial-level procurement staff. The MPCLG procurement specialist also regularly visited the provinces to provide support when needed.

c. Unintended impacts (Positive or Negative)
None reported.

d. Other

11. Ratings			
Ratings	ICR	IEG	Reason for Disagreements/Comment
Outcome	Satisfactory	Satisfactory	
Bank Performance	Satisfactory	Satisfactory	
Quality of M&E	Substantial	Modest	The project's outcome indicators were insufficient for complete measurement of all three objectives. The project

		team had to bring in additional data at the ICR stage to assess achievement fully.
Quality of ICR	Substantial	

12. Lessons

The ICR (p. 27) provided useful lessons, some of which are adapted here by IEG:

- Implementing a communication strategy that clearly describes objectives, roles, and responsibilities is critical for ensuring the success of a large reform program. This project did not have a communication strategy, and at the beginning of implementation coordination between departments in the MoE and partnerships between the MoE and provinces were weak. Coordination improved mainly because the directors of the relevant MoE branches made an effort to do so.
- Building capacity at all implementation levels is critical to successful project implementation. In this project, capacity was continuously built at the central ministry and the provincial level. However, inadequate staffing and capacity constraints, especially at the provincial, zonal, and school levels, led to implementation challenges such as those noted in the Mid-Term Review (see Section 5 for more details). Continuous capacity building efforts at lower implementation levels would have been beneficial.
- Project designs that are flexible to adapt to changing circumstances can be beneficial. The project was embedded in the government's five-year national education sector strategy which was updated on a yearly basis based on changing circumstances. The Bank team stated that the updated strategy was useful in providing a coherent overarching framework for implementation.

13. Assessment Recommended?

No

14. Comments on Quality of ICR

The ICR provided a solid and candid overview of project preparation and implementation. It was outcome driven and provided useful lessons learned. It compensated for the lack of adequate outcome indicators in the project's Results Framework by bringing in additional relevant outcome data. However, the ICR did not distinguish between DLIs and intermediate outcome indicators included in the Results Framework and often referred to both as outcome indicators. Also, it did not consistently state whether DLIs were achieved. Many of the planned outputs noted in the PAD were not addressed in the ICR, such as support for tuition, textbooks, uniforms, meals, transportation subsidies, sanitation facilities, measures to ensure that all students had



schools within reasonable distances of their homes. Furthermore, the ICR did not provide information on procurement even though the procurement risk was rated High at appraisal. The ICR is rated Substantial, but only marginally so.

a. Quality of ICR Rating Substantial