Report Number : ICRR0020816

1. Project Data

Operation ID	Operation Name
P147226	Public Finance DPL
Country	**Practice Area(Lead)**
Albania	Macroeconomics, Trade and Investment

L/C/TF Number(s)	Closing Date (Original)	Total Financing (USD)
IBRD-83990	30-Dec-2015	120,000,000.00
Bank Approval Date	**Closing Date (Actual)**	
29-May-2014	30-Dec-2015	

	IBRD/IDA (USD)	Co-financing (USD)
Original Commitment	120,000,000.00	0.00
Revised Commitment	120,000,000.00	0.00
Actual	115,511,270.25	0.00

Prepared by	Reviewed by	ICR Review Coordinator	Group
Felix Oppong	Clay Wescott	Malathi S. Jayawickrama	IEGEC (Unit 1)

2. Project Objectives and Policy Areas

a. Objectives

The initial Program Development Objective (PDO) for the series was: “to improve Albania’s fiscal sustainability through: (i) strengthening public financial management (PFM) to address arrears; and (ii) tax, pension and energy sector reforms to support macro-fiscal stability” (Program Document (PD) Development Policy Loan (DPL)1, p. 10). The second operation revised a part of the PDO to: (ii) tax, pension and energy sector reforms to improve fiscal sustainability” (PD, Policy-Based Guarantee (PBG), p. iv).

The ICR attributed the rewording to advice from Bank Management, aimed at strengthening the link between the prior actions and the series (ICR, p. 5). This review will assess the results based on the revised formulations, given that it is not significantly different from the original PDO.

b. Were the program objectives/key associated outcome targets revised during implementation of the series?

---

c. Pillars/Policy Areas

Both operations of the series addressed two pillars:

i. Strengthening PFM to address arrears.

This policy area aimed at strengthening PFM systems to clear and prevent arrears. Also, the government aimed to avoid the accumulation of new arrears during the reform period (2014 and 2015). Clearing arrears was needed to make Albania's fiscal and debt position more credible. The DPL and PBG supported the implementation of the Government's arrears clearance and prevention strategy that was developed with the assistance of the World Bank, International Monetary Fund, and European Commission. The operations aimed at preventing the accumulation of arrears, establishing multi-year budget ceilings for spending categories, prioritizing capital spending projects and monitoring budget execution.

ii. Tax, pension and energy reforms to improve fiscal sustainability

The program supported the partial reversal of a 2009 reduction of the corporate income tax (CIT) rate, establishment of a Compliance Risk Management model, reform of an unsustainable social pension system, and clearing of arrears in the energy sector. The program recognized the need to reform tax policies and administration to improve fiscal sustainability. Albania's old pension system was described as lacking fiscal sustainability, fairness and incentives, and thus required reforms to reduce its reliance on the government's fiscal account (PD PPG, p. 15). Also, high energy sector arrears and public debt were weighing heavily on Albania's growth prospects and threatening to reverse progress made in reducing poverty. Reducing arrears and contingent liabilities in the energy sector were critical to attaining fiscal sustainability and providing liquidity to the banking sector of Albania.

The PBG supported structural reforms such as the enactment of a new Pensions Law, and approval of a new Power Law. The DPL and PBG complemented more comprehensive energy sector reforms supported by the Bank's Power Recovery Project.

d. Comments on Program Cost, Financing, and Dates

The programmatic series provided the government of Albania with a total commitment of US$346.7 million. The first operation was a policy loan (credit), while the second operation was a public finance PBG. The

DPL was appraised on April 3, 2014 and a commitment of EUR87 ($120) million approved by the Board on May 29, 2014. It became effective on August 13, 2014, disbursing EUR 87 (US$115.5) million by the closing on June 30, 2015. The difference between the approved and disbursed amount in US$ is due to changes in the exchange rate. The second operation was appraised on February 2, 2015 and approved by the Board on March 27, 2015. It became effective on July 31, 2015 and the full guarantee of EUR 200 (US$226.7) million was applied before closing on April 30, 2016; there was no disbursement needed from this operation. The second operation was originally envisaged to be effective on June 15, 2015 but the change of instrument affected the date of effectiveness.

3. Relevance of Objectives & Design

a. Relevance of Objectives

The programmatic series addressed relevant challenges affecting the Albanian economy between 2012 and 2016. Some of the key challenges the economy faced were: the weakening of the PFM systems, which had resulted in the accumulation of general government arrears; a surge in the public debt; rising levels of non-performing loans in the banking sector; an unsustainable pension system; and an energy sector that was increasingly absorbing fiscal resources in the economy. At appraisal, the government's expansionary fiscal policy had caused a deterioration of many of the macroeconomic indicators, including a fiscal deficit that was understated by accumulated arrears of 5.3 percent of GDP in 2013 (PD DPL, p. 1).

The objectives of the program were in line with the government's National Strategy for Development and Integration. They were also consistent with the World Bank's Country Partnership Strategy (CPS) FY11-FY14 for Albania and the CPS FY15-FY19, which had macroeconomic stability and sustainability as a focus area.

Rating
High

b. Relevance of Design

The design of the operations focused on the two policy areas. The prior actions and triggers were appropriately linked to the two policy areas, which emphasized clearance and non-accumulation of arrears, and the implementation of structural measures. The choice of programmatic series was appropriate and enabled the team to adjust some of the reforms during the second series. Most of the reform actions supported a causal chain linked to objectives and outcomes. The second operation was not envisaged as a PBG during the first operation. The PBG was preferred to a second DPL as it held the promise of reducing Albania's borrowing costs, while restructuring the debt profile (ICR, p. 10).

The macroeconomic situation was deemed adequate for the operations. The adoption of an International Monetary Fund (IMF) program a couple of months before the approval of the DPL ensured the maintenance of an adequate macroeconomic policy framework during approval and implementation. The ICR noted that the IMF's Extended Fund Facility was approved in February 2014. Also, the IMF conditionality was highly complementary and well aligned with the reforms contained in the Bank-supported programmatic series (ICR, p. 16).

Despite the above mentioned positive design aspects, some shortcomings are worth mentioning. First, some of the policy actions in the PBG were weaker compared to triggers envisaged in the first operation. In particular, trigger #4 under the DPL required budget users to record commitments within three days (in line with the law), but this was narrowed by adjusting it to recording all "contractual commitments" in the PBG, without a system for monitoring and enforcing the timely reporting of commitments (e.g. through sanctions and penalties in line with Albanian law). Also, trigger #6 requiring the Ministry of Finance to clear all budgetary energy arrears was replaced with prior action #8 that required clearance of 60 percent of the arrears of central government, public water utility and public schools to the Energy sector.

Second, the design did not consider the implications of the inflexibility of the procurement law. The ICR reports delays in the implementation of PBG prior action #5 due to delays in the procurement of a server to enable the Ministry of Finance to upgrade software linked to the reform. This was resolved through changes in procurement regulations and the system became operational in May 2017, after the program had closed.

Third, the program intended to increase the productivity of the value-added tax (VAT) relying mainly on support provided to the Government by the EU, for the introduction of a Compliance Risk Management Model, without clearly recognizing that improving the productivity of the VAT requires considerable time and preparation. The ICR describes the choice of "VAT productivity" as an unusual results indicator because it was introduced in May 2015 to measure results between 2013 and 2015. The expected results were to be driven by prior action #5 in the 2015 PBG, which amounted to the establishment of the above-mentioned Compliance Risk Management Model. The ICR reports a delay in the implementation of prior action #5, stating that it went live just prior to the expected approval date of the PBG (ICR, p. 19).

Rating
Substantial

4. Achievement of Objectives (Efficacy)

Objective 1

Objective

To improve Albania’s fiscal sustainability through strengthening of public financial management to address arrears.

Rationale

Efficacy is assessed against two outcome indicators: (i) More than 70 percent of central government arrears as of end-December 2013 are cleared by end-December 2015 and (ii) No new central government arrears accumulated in 2014 and 2015.

The central government cleared 98.6 percent of the arrears. Of the total arrears cleared, energy sector arrears netted off against other liabilities of the sector to Government accounted for 6.2 percent. The target was achieved in line with the implementation of the central government’s arrears clearance and prevention strategy, and after the verification of all outstanding obligations and liabilities of the central government. However, the second target aimed at non- accumulation of new central government arrears was not met, even though Parliament had established a mandatory expenditure ceiling for each budget user for 2015, 2016 and 2017. The ICR reported the accumulation of small new arrears (about 1.8 billion Lek or 0.11% of GDP in 2016), mostly from road construction and water infrastructure projects (ICR page 6). The ICR indicated that the Government of Albania paid down these new arrears as part of an IMF Program conditionality. Overall, the series ensured a reduction in the stock of arrears which was a major source of fiscal unsustainability in the economy. However, the reforms were not enough to completely prevent future accumulation of arrears.

The series did not measure other indicators of fiscal sustainability such as the overall fiscal balance which improved during the period. The overall fiscal deficit declined steadily as a share of GDP from 5.5 percent in 2014 to 1.7 percent in 2016, with the primary balance moving from a deficit of 2.6 percent of GDP in 2014 to a surplus of 0.7 percent of GDP in 2016. However, public debt including arrears owed to local government remained high at 72.1 percent in 2016 compared to 73.7 percent at end-2015 and 70.4 percent of GDP in 2013. Public debt (excluding arrears) declined to 69.3 percent in 2016 from a peak of 71.7 in 2014. These results indicate that Albania moved towards improved fiscal sustainability.

On balance, the series supported reforms aimed at improving the fiscal sustainability of the Albanian economy. There were some improvements towards fiscal sustainability but there remains a huge effort to stabilize the economy and deal with other challenges such as exchange rate depreciation, avoidance of the re-occurrence of new arrears and financial sector stability.

Rating

Substantial

Objective 2

Objective

Tax, pension and energy sector reforms to improve fiscal sustainability

Rationale

Tax reforms

Efficacy is assessed by the achievement of improved fiscal sustainability through tax reforms.

The program had two targets, which aimed to increase revenues from CIT by 0.5 percent of GDP from 2013 to 2014; and to increase the productivity of the VAT by 10 percent between 2013 and 2015. Revenues increased from 5.1 billion Lek (1.1 percent of GDP in 2013) to 21.5 billion Lek in 2014 representing (1.5 percent of GDP) just short of the target of 1.6 percent of GDP. The productivity of VAT measured by the Compliance Risk Model was reported to have reached 54.3 percent in 2016 (missing the target of 62.1 percent) from a baseline of 52.1 percent in 2013 (ICR page 7). The ICR attributed this shortfall to underperformance of revenue collections due to a slowdown in consumption in 2015, challenges in revenue administration, inadequate coordination among the responsible institutions, and an underestimation of the stock of tax credits in the system.

In the PBG, prior action 2 contributed to preventing future arrears, tightening enforcement of expenditure ceilings for line ministries with respect to investment projects, and strengthening public investment management to prioritize projects.

Overall, despite the limited results achieved following the introduction of support for improving the VAT's productivity, the total tax revenue was increased from 22.0 percent of GDP in 2013 to 24.6 percent in 2016. The improvement is partly explained by an increase in profit tax from 1.1 percent of GDP in 2013 to 1.9 percent in 2016, and an increase in VAT from 8.0 percent of GDP to 8.5 percent in 2016 (IMF Country Report No. 17/64). These measures were implemented outside the program, but they were congruent with the policy actions supported by the Bank.

Pension reforms

Efficacy is assessed against the target of improving fiscal sustainability through pension reforms. The target was to moderate government financing of the pensions system below 3.26 percent of GDP in 2015 in the DPL. However, the target was revised upwards in the PBG to 3.45 percent of GDP to account for an estimation error by the authorities. The respective baseline was also revised so the change in target did not amount to reducing the program's ambition. The revised target was met. While pensions continued to pose a heavy burden to public finances, the reforms supported by the program are estimated to reduce the pensions deficit financing from 2.2 percent of GDP in 2015 to below 1.1 percent in 2019 under the new law supported by the series (PAD 2 page 16-17). On balance, the target was met and the reforms supported are expected to lead to improvements in fiscal sustainability, especially in the medium to long term and if the new law is fully implemented.

Energy Sector reforms

Efficacy is assessed against two outcome indicators expected to contribute to fiscal sustainability. These indicators include (i) no new central government arrears accumulated to energy sector in 2014-2015 and (ii) government guarantees for non-weather-related energy imports are 30 percent lower in 2015 than in 2013. The first target was met. The ICR confirmed that the central government did not accumulate additional arrears in the energy sector after 2013.

Similarly, the second target was met. The guarantees for non-weather-related power imports in 2015 was 4.6 billion Lek, which is 62 percent lower than the target of 12 billion Lek in 2013. On balance, the non-accumulation of energy sector arrears and reduction of government guarantees contributed to reducing the risks to public finances. The Fiscal Risks Unit was established in the Ministry of Finance to assess contingent liabilities of the budget including those arising from the energy sector. Also, public access to fiscal information was improved with the publication of the investment projects list and the inclusion of tax expenditures in budget documentation (ICR page 26). These measures were implemented outside the program, but they were congruent with the policy actions supported by the Bank.

On balance, the two indicators contributed to achieving fiscal sustainability. In February 2016, nearly one year after the approval of the PBG, Standard & Poor upgraded their rating of the Albanian economy to B+ (stable) from “B” with a stable outlook in April 2014, citing “ongoing improvements in the government’s debt maturity structure”. The reduction in government guaranteed obligations contributed to the upgrade.

Rating
Substantial

5. Outcome

The relevance of the objectives of the series is rated high. The relevance of design is substantial. Objective one was substantially achieved with the significant reduction in arrears. Under objective two, the program contributed to substantial achievements in terms of enhancing fiscal sustainability.

a. Outcome Rating
Satisfactory

6. Rationale for Risk to Development Outcome Rating

There were substantial risks associated with both the DPL and the PBG, including politics and governance, macroeconomic outlook, sector strategies and policies, institutional capacity for implementation and sustainability, and fiduciary risk. The risks rating was reduced from high in the DPL to substantial in the PBG following mitigation measures taken by the government during the implementation of the first DPL. The presence of an IMF-supported program with tri-annual monitoring and reviews provided a strong anchor for mitigating risks.

The risks arose from both external and domestic sources. There were external macroeconomic risks which were perceived to possibly undermine output growth, fiscal consolidation and fiscal sustainability. These risks emanated from uncertain global market conditions, especially slower growth in the European Union (EU). A potential deterioration of the Euro area economic outlook could reduce exports, foreign direct investment inflows, and remittances, resulting in lower revenue collection and slower output growth in Albania.

Domestic risks emanated from politics, fiscal policy and the energy sector. Politics and governance related risks such as weakened rule of law and corruption were significant. There was public discontent with reforms, political pressures for inserting ad hoc fiscal spending items in the budget and municipal elections related spending in the summer 2015. There were also domestic fiscal risks related to the energy sector and the government's compensation scheme for expropriation. The energy sector risks were partly due to reliance on rainfall for hydropower, coupled with persistently high distribution losses in the sector. Rising fiscal risks were deemed as potentially affecting the achievement of results.

Some risks were mitigated during the series to enable the achievement of results. Significant financial support from the World Bank, the IMF and the EU helped mitigate the macro-related risks. The Political risks arising from Parliamentary elections slowed down reforms in the short term, while energy sector related risks were monitored quarterly by the government. The establishment of an inter-Ministerial task force to oversee the implementation of the power sector reforms assisted in mitigating risks associated with non-implementation. For instance, the removal of the block tariffs contributed to increases in household expenditures on electricity across each income quintiles but direct transfers through the social assistance system were provided to vulnerable households, including poor households, families without incomes, retired people and civil servants with low wages (ICR page 26).

New projects approved after this series are helping to mitigate the longer-term risks that were not mitigated by the project. An example is the Financial Sector DPL, which aims at strengthening the resiliency of the banking sector to deal with high NPLs.

Significant medium-term risks remain which need to be mitigated. These include uncertain global market conditions, program risks related to possible reform reversals, debt rollover risks given the 2017 elections related expenditure slippages, and rising non-performing loans (NPLs). Weakened growth prospects in the EU could reduce inflows into the external sector of Albania, and further slowdown output and revenue growth. A faster than expected normalization of global interest rates could also pose some risks that are likely to affect debt and revenues. Public debt rose rapidly due to pre-electoral fiscal slippages in 2017. Lower revenues, higher debt stock, and continued reliance of the pensions sector on government financing could pose some risks to fiscal sustainability.

The IMF program has ended and thus, the pace of implementation of reforms may slow down if deliberate systems are not in place to sustain the momentum of on-going reforms. There are still energy sector reforms related to the power exchange market and deregulation of prices, which need to be sustained. The risk of arrears accumulation may rise if not monitored, especially arrears arising from infrastructure sectors.

a. Risk to Development Outcome Rating

Substantial

7. Assessment of Bank Performance

a. Quality-at-Entry

The preparation of the operations benefited from analytical and diagnostic work, and technical assistance provided over several years, in anticipation of a change in government. Some of these analytical products include the Public Finance Review, a pension policy note and its associated technical assistance (TA), energy sector TA, PFM TA and regional activities (e.g. Western Balkans programmatic poverty and gender assessments). The series also benefited from published strategy documents and relevant publications such as the National Strategy for Development and Integration, CPS FY11-14, Albania Systematic Country Diagnostic and the Financial Sector Assessment Program of 2013.

The Bank collaborated closely with the International Monetary Fund and the European Commission. The two operations were also fully aligned with the IMF program. Through an Extended Fund Facility arrangement in 2014, the IMF provided financial support in the amount of EUR330.9 million (around US$457.1 million) over a three-year period to support structural reforms related to arrears clearance and prevention, NPL resolution, financial sector supervision, domestic debt market development, tax policy, tax administration and the social security system. The program was also aligned with the European Commission's allocation of EUR594 to Albania which supported the implementation of reforms in public administration and the justice system.

The potential challenges and risks were adequately diagnosed and mitigated throughout the series.

Quality-at-Entry Rating

Satisfactory

b. Quality of supervision

Bank teams (Macro Economics & Fiscal Management staff and sector colleagues) collaborated and regularly monitored progress of reforms to address capacity constraints challenges and enhanced the sustainability of reforms. The ICR indicated that the Bank's supervisory role focused on implementation challenges due to the country's weak institutional capacity. The supervision informed the Bank's decision to switch to a PBG to effectively address the challenges facing the economy.

The Bank's long period of engagement leading to the 2013 Parliamentary elections provided an opportunity for it to collaborate with the new coalition government. Also, the Bank's engagement with the authorities resulted in the creation of a body of analytical and diagnostic work on key reform priorities that helped build institutional capacity and a relationship of trust. The Bank collaborated with the IMF and augmented its own quarterly monitoring with information received from the review of the Fund's program.

Quality of Supervision Rating
Satisfactory

Overall Bank Performance Rating
Satisfactory

8. Assessment of Borrower Performance

a. Government Performance
The government's commitment to the program was satisfactory. The new government was committed to tackling dormant reforms which were critical for macro- fiscal stability and fiscal sustainability. It confronted the arrears and pensions challenges underpinning the macroeconomic instability with political will and commitment. Progress was underpinned by clear leadership and coordination across some key ministries (Finance, Youth and Social Welfare, Economy and Energy) through the Prime Minister-chaired Strategy Planning Committee, and a coherent and proactive communications strategy that built public support for reforms.

This commitment did not necessarily translate into rapid implementation of all reforms at the same pace. Slower than expected progress was made on reducing the stock of debt due to exchange rate depreciation (against the USD), higher than expected inflation, slower than expected growth and under-performance in revenue collection (particularly VAT- ICR p. 29).

Government Performance Rating
Satisfactory

b. Implementing Agency Performance
The implementing agencies were the Office of the Prime Minister, the Ministry of Finance, the Ministry of Youth and Social Welfare, the Ministry of Economic Development, Tourism, Trade and Entrepreneurship and the Ministry of Energy and Industry. The Bank worked closely with these institutions to prepare, monitor and assess progress of each reform. Where necessary, the Bank provided technical assistance to the implementing agencies.

Implementing Agency Performance Rating
Satisfactory

Overall Borrower Performance Rating
Satisfactory

9. M&E Design, Implementation, & Utilization

a. M&E Design
The results framework presented indicative baselines for all the quantitative indicators, which improved the robustness of the design. The objectives were clearly specified and slightly adjusted during the PBG. The results indicators covered critical fiscal sustainability challenges such as arrears clearance and prevention, tax reforms, pensions and power sector reforms.

b. M&E Implementation

The series was monitored through continuous dialogue with government counterparts which led to revision of the M&E framework during the preparation of the PBG operation. Notable revisions were the dropping of the indicator for the non-accumulation of new central government arrears in the energy sector in 2014 and 2015, and upward revision of the stock of central government arrears as at end December 2013 from 68.5 billion Lek to 70.7 billion Lek, and the raising of the ceiling for government financing of the pension system (due to a previous calculation error by the government but not implying reducing program ambition).

c. M&E Utilization
The Bank utilized its assessment to commence further policy dialogue beyond this series. Several policy reforms initiated under the DPL/PBG series needed to be sustained and enhanced to ensure continuous fiscal sustainability. One such area was the financial sector. The series was followed by a financial sector DPL for US$100 million approved in March 2017.

M&E Quality Rating
Substantial

10. Other Issues

a. Environmental and Social Effects

The policies supported by the series were expected to have positive gender, poverty and social impact in the medium to long term. In the short term, the government paid 6 billion Lek in arrears on disability insurance, out of which in urban areas, 11 percent went to the poor and 32 percent to the bottom 40 percent. In the rural areas, 24 percent went to the poor and 56 percent to the bottom 40 percent. These payments had a positive social impact. In the medium term, the new pensions law included a social provision aimed at offering a secured source of income to elderly people without contributory pension rights.

Also, the pensions reform envisioned a gradual increase of the retirement age of women from 60 years to 67 years as part of efforts to address old age poverty among women. The increase started in 2015 and ends in 2056. The retirement age for men stayed at 65 years. This reform is expected to have a positive gender effect.

The impact of the energy sector reforms was mixed. While, the clearance of arrears contributed to liquidity and growth of the economy, higher collection of energy bills is expected to have a negative impact on poor households (as acknowledged by the ICR).

b. Fiduciary Compliance

There were no fiduciary compliance issues related to the series. However, there were some fiduciary risks associated with staff turnover in the Ministry of Energy, lack of management capacity, and a tight fiscal situation.

c. Unintended impacts (Positive or Negative)

There were no reported negative unintended outcomes.

d. Other

None

11. Ratings

Ratings	ICR	IEG	Reason for Disagreements/Comment
Outcome	Satisfactory	Satisfactory	---
Risk to Development Outcome	Substantial	Substantial	---

Bank Performance	Satisfactory	Satisfactory	---
Borrower Performance	Satisfactory	Satisfactory	---
Quality of ICR		Substantial	---

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

12. Lessons

This review supports the lessons cited in the ICR, especially: (i) the need for the Bank to move quickly when windows of opportunity present themselves; (ii) the need to leverage IBRD resources to help countries to de-risk; (iii) the need for the Bank to work with governments to have a proactive and well-conceived public communication plan on potentially controversial reforms; and (iv) close collaboration among development partners and governments on reforms could be productive.

Other lessons cited in the ICR with adaptation in language are the following:

1. Producing relevant analytical work that addresses critical challenges facing member countries, within the context of a difficult non-receptive government could pay off at the end and enable the Bank to influence change. In the case of Albania, the Bank relied on its analytical work to ignite its dialogue with the newly elected government.

2. Flexibility in adjusting envisaged instruments allowed the Bank to have more influence. The switch from a DPL to a PBG enabled the government to gain the resources required to clear the outstanding arrears and restructure its domestic debt.

3. Working closing with other development partners helped to sustain critical reforms. In the case of Albania, the IMF introduced a conditionality to support the Bank’s results indicator on the non-accumulation of new arrears.

4. Identifying and working with senior members of government who are champions of the Bank- supported reforms is critical to successful implementation of programs. In the case of Albania, the Strategic Planning Committee, chaired by the Prime Minister, provided a mechanism for holding ministers accountable and addressing bottlenecks in a timely manner.

13. Assessment Recommended?

No

14. Comments on Quality of ICR

The ICR provided a detailed analysis of many important aspects of the series. It was well written and covered relevant issues undertaken by the programmatic series. It also gave explicit evidence on most results indicators, a good explanation of contextual issues, and appropriate analysis of each pillar. The lessons provided were equally relevant to the series. The ICR did not measure the outcome using other indicators of fiscal sustainability such as fiscal deficit, and debt service to revenue ratio. Within the context of arrears clearance, an extensive discussion comparing fiscal deficit and debt accumulation would have been more useful in explaining the outcome of the reforms. Nonetheless, the ICR was concise and internally consistent.

a. Quality of ICR Rating

Substantial