Report Number: ICRR0021982

1. Program Information

Country	**Practice Area (Lead)**
Liberia	Macroeconomics, Trade and Investment

Programmatic DPF

Planned Operations	**Approved Operations**
4	6
Operation ID	**Operation Name**
P127317	LR-PRSC-I (FY13)

L/C/TF Number(s)	**Closing Date (Original)**	**Total Financing (USD)**
IDA-52770	30-Jun-2014	10,349,892.00
Bank Approval Date	**Closing Date (Actual)**	
26-Jun-2013	30-Jun-2014	

	IBRD/IDA (USD)	Co-financing (USD)
Original Commitment	10,000,000.00	0.00
Revised Commitment	10,000,000.00	0.00
Actual	10,349,892.00	0.00

Country	**Practice Area (Lead)**
Liberia	Macroeconomics, Trade and Investment
Operation ID	**Operation Name**
P146619	LR PRSC II (P146619)

L/C/TF Number(s)
IDA-52770,IDA-55500,IDA-H9990

Closing Date (Original)
30-Jun-2015

Total Financing (USD)
28691851.00

Bank Approval Date
12-Nov-2014

Closing Date (Actual)
30-Jun-2016

	IBRD/IDA (USD)	Co-financing (USD)
Original Commitment	30,000,000.00	0.00
Revised Commitment	30,000,000.00	0.00
Actual	28,691,851.00	0.00

Country
Liberia

Practice Area (Lead)
Macroeconomics, Trade and Investment

Operation ID
P151502

Operation Name
LR-PRSC III (FY16) (P151502)

L/C/TF Number(s)
IDA-55500,IDA-D1420,IDA-H9990

Closing Date (Original)
30-Jun-2017

Total Financing (USD)
39061561.00

Bank Approval Date
17-Nov-2016

Closing Date (Actual)
31-Dec-2017

	IBRD/IDA (USD)	Co-financing (USD)
Original Commitment	40,000,000.00	0.00
Revised Commitment	40,000,000.00	0.00
Actual	39,061,561.00	0.00

Country
Liberia

Practice Area (Lead)
Macroeconomics, Trade and Investment

Operation ID
P162111

Operation Name
MFMPRSDPO-IV (P162111)

L/C/TF Number(s)	Closing Date (Original)	Total Financing (USD)
IDA-D1420,IDA-D2710,TF-A6378	31-Dec-2018	25367493.88
Bank Approval Date	**Closing Date (Actual)**	
24-Jan-2018	31-Dec-2018	

	IBRD/IDA (USD)	Co-financing (USD)
Original Commitment	20,000,000.00	4,670,000.00
Revised Commitment	20,000,000.00	4,670,000.00
Actual	20,697,493.88	4,670,000.00

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2. Program Objectives and Pillars/Policy Areas

a. Objectives

Liberia Poverty Reduction Support Development Policy Operation (PRSDPO) series consisted of four operations and two supplemental financings. The original project development objective (PDO) as described in the Program Document (PD) for PRSDPO-I (P127317) and replicated in PRSDPO-II (P146619) was to "*sustain and deepen government-owned efforts to reform governance and civil service, and to support the broadening of reforms to include economic transformation and human development in the context of the implementation of the Government's second Poverty Reduction Strategy—the Agenda for Transformation*" (PD pp. vi and 19). The PDO was revised in PRSDPO-III. The revised PDOs were*: (i) strengthening governance with particular emphasis on transparency and accountability as well as budget execution and oversight; (ii) addressing key constraints to growth, including electricity and land; and (iii) improving human capital development particularly through improved access to education and health* (PRSDPO-III PD, pp. viii and 11). The PDO for PRSDPO-IV remained the same with two notable differences/inconsistencies: while p. vii of the document reproduces the PDO from PRSDPO-III verbatim, the main text of the document (p. 14) adds "land" to objective (ii) and excludes "education" from objective (iii), leaving "health".

For the purposes of this evaluation, the consolidated objectives of this program were as follows:

PDO 1. Strengthening governance

PDO 2. Addressing key constraints to growth

PDO 3. Improving human capital development

b. Pillars/Policy Areas

The PD for PRSDPO-I outlined the main reform areas, which were mostly governance-related: They were (i) transparency and accountability; (ii) improving budget execution and oversight; (iii) civil service reform; and (iv) improving land administration to reduce conflicts and enhance the investment climate. The PD describes three project "components" (instead of pillars/policy areas): (i) governance and civil service reform, including transparency and accountability, customs administration, public financial management, and procurement; (ii) economic transformation, including infrastructure, and agriculture and land reform; and (iii) human capital development, including education.

In the next three operations, these "components" become pillars/policy areas; with some small variations within these pillars across the series. For example, PRSDPO-II Pillar 1 does not have an area on "customs administration", which appears again in PRSDPO-III; while PRSDPO-IV changes it to "*tax* and customs administration". Similar to PRSDPO-I, Pillar 2 in PRSDPO-II includes areas of infrastructure (energy, power, and transport), and agriculture and land reform. PRSDPO-III drops transport and agriculture, and PRSDPO-IV brings back agriculture and drops power (Table 1). The ICR does not describe these changes and lists only a few changes made after PRSDPO-II.

For the purpose of this evaluation, the consolidated pillars/policy areas for the program are as follows:

1. Governance:

1.1. Transparency and accountability

1.2. Civil service reform

1.3. Tax and customs administration

1.4. Public financial management

1.5. Procurement

2. Economic transformation:

2.1. Energy

2.2. Agriculture and land reform

3. Human capital development:

3.1. Education

3.2. Health

The program included a total of 34 prior actions (PAs), listed in the table below.

Table 1. Prior Actions for the Program (by policy areas)

Policy areas		Prior actions
1. Governance	1.1. Transparency and Accountability	**PA1.1.1.** The Recipient has adopted an anti-money laundering and anti-terrorism financing regulation to enhance transparency and accountability **PA1.1.2.** The Recipient has completed the preparation of a three-year strategy, whose substance is acceptable to the Association, for the Liberia Anti-Corruption Commission **PA1.1.3.** The Recipient has established a financial intelligence unit whose vocation is to help increase transparency in the Recipient's financial transactions. **PA1.1.4.** The Recipient has facilitated the effective operation of its Financial Intelligence Unit through issuing: (a) Regulation on Currency Transaction Reporting for Financial Institutions (FIU/CBL/SR1A-CTR/02/2016); (b) Regulation on Suspicious Transaction Reporting for Financial Institutions (FIU/CBL/SR2A-STR/02/2016); (c) Regulation for Further Distribution and Action on the UN List of Terrorists and Terrorist Groups (FIU/OR1A-ER/02/2016); and (d) Regulation Dealing with Cross-Border Transportation of Currency and Bearer Negotiable Instruments (LRA/FIU/OR1-CN/02/2016). **PA1.1.5.** The Asset Disclosure Unit within the Recipient's Liberia Anti-Corruption Commission (LACC) has become operational as evidenced by the employment of an asset verification officer pursuant to an employment contract dated November 2, 2015 **PA1.1.6.**The Recipient has through the Central Bank of Liberia, issued a regulation to improve the capacity of CBL to compel financial institutions to comply with their obligations on anti-money laundering and combat the financing of terrorism to promote a more efficient sanctions regime. **PA PA1.1.7.** The Recipient has through the Liberia Anti-Corruption Commission, issued a regulation to facilitate civil servants' declaration of their assets to promote integrity in the civil service
	1.2. Civil Service Reform	**PA1.2.1.** The Recipient has prepared and adopted a revised pay reform strategy merging allowances and base pay for civil service cadres, with a view to enhancing transparency and accountability of the Recipient's public service. **PA1.2.2.** The Recipient has completed merging of discretionary allowances and base pay for civil servants at levels 1-4 as evidenced by a Personnel Action Notice from the Recipient's Civil Service Agency to the Ministry of Finance and Development Planning, dated April 12, 2016

		setting out the consolidated pay scale for each of the grades covered under levels 1-4. **PA1.2.3.** The Recipient has through its Civil Service Agency: (a) completed the merger of discretionary allowances and base pay for civil servants; and (b) set out the consolidated pay scale for grades 1-10 to remove distortions in civil servants' salaries and enhance transparency and accountability in the public service
	1.3. Tax and Customs Administration	**PA1.3.1.** The Recipient has rolled out a new custom administration system (ASYCUDA) to two additional ports of Bo-Waterside and Ganta to improve customs administration and enhance service delivery. **PA1.3.2.** The Recipient has submitted to its parliament for enactment, a draft "Modernized Customs Code of Liberia (2017)" to strengthen customs and tax administration.
	1.4. Public Financial Management	**PA1.4.1.** The Recipient, through its MOF, has adopted integrated financial management information systems (IFMIS) in its payroll processing, to strengthen its fiscal discipline and budget transparency. **PA1.4.2.** The Recipient, through its MOF, has submitted its IPSAS-based financial statements for FY 2010/2011 and FY 2011/2012 to GAC, to improve its internal budget controls **PA1.4.3.** The Recipient has completed the installation of the civil service management module of the integrated financial management information systems (IFMIS), with a view to strengthening fiscal discipline and budget transparency. **PA1.4.4.** The Recipient has completed the roll-out of the IFMIS to eleven (11) additional ministries and agencies, for a total of nineteen (19) and brought five (5) donor-financed projects onto pilot tested mode in IFMIS, with a view to facilitating management of public systems. **PA1.4.5.** The Recipient has submitted its IPSAS-based financial statements for FY 2012/2013 to its General Auditing Commission for audit, with a view to improving internal budget controls. **PA1.4.6.** The Recipient has, through its Civil Service Agency, improved civil service payroll management by: (a) completing the validation of all employees through biometric authentication; and (b) linking the human resource management information system (HRMIS) to the payroll system as evidenced by a letter and interim reports from the Civil Service Agency to the Ministry of Finance and Development Planning dated May 2, 2016.

		PA1.4.7. The Recipient has prepared and published quarterly comprehensive government finance statistics as set forth in the Annual Fiscal Outturn Report for FY 2013/2014 and the Annual Fiscal Outturn Report for FY 2014/2015 **PA1.4.8.** The Recipient has submitted to the General Auditing Commission its report on the Annual Consolidated Fund for FY 2014/2015 for audit, with a view to improving internal budget controls. **PA1.4.9.** The Recipient has through its Ministry of Finance and Development Planning: (a) published on its website quarterly comprehensive GFS-compliant fiscal operations reports for Liberia for FY2015/16 and FY2016/17 to promote budget transparency; **and (b)** submitted the IPSAS compliant financial statements for FY2015/16 and FY2016/17 to the GAC to improve internal budget controls.
	1.5. Procurement	**PA1.5.1.** The Recipient has structured, within its civil service, a career track for procurement specialists, with a view to improving budget execution. **PA1.5.2.** The Recipient has completed the technical review of draft implementing regulations, adopted by the Board of Commissioners of the Recipient's Public Procurement and Concession Commission, with a view to strengthening the Recipient's procurement systems. **PA1.5.3.** The Recipient's PPCC has approved and published minimum standards and a procurement accreditation system entitled Design of a Procurement Professionalization System for Liberia dated May 25, 2016 to certify procurement practitioners with a view to professionalizing public procurement. **PA1.5.4.** The Recipient through the Minister of Finance and Development Planning, has approved the transfer of the Financial Management Training School to the University of Liberia to enhance the professionalization of financial management and procurement specialists, and started the transfer process
2. Economic Transformation	2.1. Energy	**PA2.1.1.** The Recipient has: (a) issued a Petroleum Import License dated August 23, 2016 to LEC to import HFO to generate electricity for public service with its own generating plants; and (b) introduced an open and competitive procurement process for the importation of HFO for LEC's own generating plants, through LEC's Board Policy Resolution dated July 4, 2016, mandating all procurement of fuels for LEC's generation of electricity to be done through an international competitive bidding process.

		PA2.1.2. The Recipient has through the Liberia Electricity Corporation, signed the contract between LEC and ESBI, a competitively selected firm, to enable ESBI to take over and improve the management of LEC.
	2.2. Agriculture and Land Reform	**PA2.2.1.** The Recipient has adopted a policy framework for land tenure reform which clarifies land ownership rights related to public land and government-owned land. **PA2.2.2.** The Recipient has established a collateral registry with a view to improving credit and expanding the rural economy **PA2.2.3.** The Recipient has pursuant to the Liberia Land Authority Act, made the Liberia Land Authority operational to improve land governance including land administration and management, as evidenced by the; (a) Ministry of Finance and Development Planning allocation of budgetary resources for the LLA in its National Budget FY 2017/2018; and (b) President's appointment of at least 4 out of the 5 Commissioners.
3. Human capital development	3.1. Education	**PA3.1.1.** The Recipient has adopted a comprehensive, fully costed implementation plan for teacher recruitment, training and deployment across all levels of the education system with a view to improving incentives for school attendance. **PA3.1.2.** The Recipient's Ministry of Education has adopted a framework for equitable resource allocation by region and pupil's poverty status, particularly with respect to the school grant scheme as evidenced in its briefing paper to cabinet entitled Revision of the Framework for Equitable Allocation by Region and Pupil's Poverty Status with Respect to School Grant Scheme dated May 6, 2016.
	3.2. Health	**PA3.2.1.** The Recipient's Ministry of Health has conducted a half-year budget execution review for FY2016 as evidenced in its report on Absorptive Capacity of Funds at Ministry of Health dated May 5, 2016 with a view to improving budget execution. **PA3.2.2.** The Recipient, through its Ministry of Health, has approved the Joint Financial Management Assessment Costed Plan 2017 to improve efficiency in the use of domestic and external resources for the health sector.

c. Comments on Program Cost, Financing and Dates

The overall context of the program was severely affected by escalation of the Ebola crisis in July 2014 (at the time of PRSDPO-II, appraised in October 2014). Following the PRSDPO-I ($10 million), the original amount of PRSDPO-II was increased from $10 million to $35 million to help mitigate the effects of the Ebola epidemic. Similarly, PRSDPO-III ($40 million) received supplemental financing ($16.6 million) to help deal with consequences of the economic crisis in the aftermath of Ebola (total $56.6 million). PRSDPO-IV ($20 million) also received supplemental TF financing of 4.7 million, totaling $24.7 million. The grand total for the series (2014-18) was $126.3 million (see ICR, Table 4). Overall, the program was extended by one year (from 2017 to

2018) due to a delay in disbursement of PRSDPO-I caused by a delay in the ratification of IDA credit by the legislature.

3. Relevance of Design

a. Relevance of Objectives

The objectives were relevant for the country needs throughout the series and consistent with the government strategy (Agenda for Transformation, AfT) - particularly given the severe challenges that the country faced in terms of poor governance, poor infrastructure and weak HD indicators. The objectives were also aligned with the Bank Group strategy in Liberia.

The original PDO (PRSDPO I-II) lacked focus ("*sustain and deepen government-owned efforts to reform governance and civil service, and to support the broadening of reforms to include economic transformation and human development in the context of the implementation of the Government's second Poverty Reduction Strategy—the Agenda for Transformation*"). For example, the PDO lists one very broad concept ("reform governance") alongside a specific aspect of public sector governance ("civil service"). It was not clear whether the aim was to focus on civil service reform or emphasize it within the efforts to reform governance overall.

The caveat of "government-owned efforts" also seems to be an unnecessary way to frame the objective. In this respect, the revised PDO 1 was a significant improvement as it clearly stated the focus ("transparency and accountability as well as budget execution and oversight") of the overall governance reform effort, and hence lent itself to better accountability, measurement and evaluation.

The same can be said about the revised PDOs 2 and 3. While the original PDO lumped together already excessively broad concepts of "governance", "economic transformation", and "human development" into one objective, under the overall unclear rubric of "broadening reforms", the revised PDOs unpacked the objective into clearer and more concrete concepts and added sectoral specificity – electricity and land for PDO 2 and health and education for PDO 3. However, even these were excessively broad and unfocused.

The PD for PRSDPO-IV contained inconsistent articulations of the PDO, as noted earlier. Health is included and education is excluded from PDO 3, but RIs only relate to education. The ICR does not explain the reason for these changes and uses the PRSDPO-IV executive summary definition of the PDO (excluding land and including education).

b. Relevance of Prior Actions

Rationale

<u>PDO 1: Strengthening governance</u>. PDO 1 was linked to the Pillar (I) on Governance. Most of areas stayed the same through the series. Prior actions for this PDO broadly followed clear logic and were relevant for achieving the intended outcomes. Overall, prior actions related to this PDO and Pillar were relatively consistent (albeit with variations within specific areas, as explained below).

1.1. Transparency and Accountability: There were 7 prior actions (PAs) for this area. These included establishing, operationalizing, and strengthening relevant institutions such as the financial intelligence unit (FIU) and the Liberia anti-corruption commission (LACC). PAs included such measures as establishing the FIU and facilitating its effective operation through issuing regulations on anti-money laundering and countering the financing of terrorism (AML/CFT), including on Currency Transaction Reports (CTRs) and Suspicious Transaction Reports (STRs), preparing a strategy for LACC, operationalizing the Asset Disclosure unit within the LACC, issuing a LACC regulation to facilitate civil servants' declaration of their assets, and also issuing a regulation to improve the capacity of Central Bank of Liberia (CBL) to compel financial institutions to comply with their obligations on AML/CFT. The PAs generally adequately reflected the triggers included in preceding credits within the series, with 2 exceptions: (i) while the trigger in PRSDPO-II stipulated that "Asset Disclosure unit within the LACC is operational with adequate staffing", the respective PA in PRSDPO-III describes operationalization in terms of hiring of one staff member, which is unlikely to make the whole system work; and (ii) the trigger in PRSDPO-III stipulated that the CBL adopts policies and procedures to conduct AML/CFT compliance inspections, whereas the PA in PRSDPO-IV mentions only a CBL regulation to improve its own capacity to compel financial institutions to comply with their obligations on AML/CFT. In both cases relevance (and efficacy) of the PAs is unclear. Considering that 5 out of 7 PAs in this area follow clear logic and are relevant to the achievement of the PDO, the relevance of this group of PAs is rated Moderately Satisfactory.

1.2. Civil Service reform. 3 PAs (PRSDPO II-IV) in this area included such measures as preparing and adopting a revised pay reform strategy, merging allowances and base pay for civil service cadres; completing merging of discretionary allowances and base pay for civil servants, and setting out the consolidated pay scale, initially for grades 1-4, followed by grades 5-10. These PAs appear to be clear and follow a logical pathway, relevant for reforming the civil service. Relevance of this set of PAs to the achievement of the PDO is rated Satisfactory.

1.3. Tax and Customs Administration. This area included 2 PAs on rolling out a new customs administration system (ASYCUDA) to two additional ports (PRSDPO-I) and submitting to parliament a draft "Modernized Customs Code of Liberia" (PRSDPO-IV). The latter was introduced to replace triggers in PRSDPO-II and III to expand ASYCUDA to remaining ports. Both measures appear to be relevant for the overall goal of strengthening customs and tax administration and enhancing service delivery, particularly the introduction of ASYCUDA. Overall, relevance of PAs for this area is rated Satisfactory.

1.4. Public Financial Management (PFM). There were total 9 PAs in this area. 4 PAs were aimed at strengthening fiscal discipline and budget transparency by adopting integrated financial management information systems (IFMIS) in payroll processing (including completing the installation of the civil service management module of the IFMIS, roll-out of the IFMIS to 19 ministries and agencies, and 5 donor-financed projects); completing the validation of all employees through biometric authentication; and linking the human resource management information system (HRMIS) to the payroll system. 5 PAs aimed at improving internal budget controls through submitting IPSAS-compliant financial statements to General Auditing Commission (GAC); and preparing and publishing quarterly comprehensive GFS-compliant fiscal operations reports. The PAs were broadly relevant to the goals of strengthening fiscal discipline and budget transparency, as well as linked to other areas (civil service reform, transparency and accountability, etc.). At the same time, it was not clear to what extent technically complex systems such as IFMIS are sustainable in the low capacity context of Liberia. Relevance of this set of PAs is rated Satisfactory.

1.5. Procurement. This area included 4 PAs that aimed at improving budget execution and strengthening the procurement systems by implementing such measures as structuring a career track for procurement specialists within civil service; and completing the technical review of draft implementing regulations of the Public Procurement and Concession Commission (PPCC). Specific measures included approving and publishing minimum standards and a procurement accreditation system to certify procurement practitioners and transferring Financial Management Training School to the University of Liberia to enhance the professionalization of financial management and procurement specialists. These measures were broadly relevant (but only as first steps) for the objective of strengthening procurement systems that were almost completely eroded during the civil war. At the same time, the PAs barely went beyond the more narrowly defined objective of establishing career track for public procurement professionals, and the only PA related to procurement regulations is very vague and non-specific. From this perspective, this area could have been better placed within the Civil Service Reform area. PA relevance in this area is rated Moderately Unsatisfactory.

Overall, the relevance of PAs for PDO 1 is rated Moderately Satisfactory.

PDO 2: Address key constraints to growth. This PDO was linked to Pillar 2 on economic transformation and covered energy, agriculture and land reform.

2.1. Energy. This area covered electricity sector which is a critical constraint to economic growth in Liberia. There were 2 PAs, one of which was initially defined as a trigger in PRSDPO-I but later deferred to PRSDPO-III. The program focused on improving the operational efficiency of Liberia Electricity Corporation (LEC), reducing costs of operations and passing efficiency improvements to the consumers through lower tariffs. The PA in PRSDPO-III included issuing a Petroleum Import License to LEC to import heavy fuel oil (HFO) to generate electricity for public service with its own generating plants; and introducing an open and competitive procurement process for the importation of HFO, mandating all procurement of fuels for LEC's generation of electricity to be done through an international competitive bidding process. The PA in PRSDPO-IV aimed at ensuring efficient delivery of electricity services to users and included signing a contract between LEC and a competitively selected firm to take over and improve the management of LEC. The PAs were relevant, with a rating of Satisfactory.

2.2. Agriculture and land reform. 3 PAs in this area included measures such as adopting a policy framework for land tenure reform which clarifies land ownership rights related to public land and government-owned land; establishing a collateral registry with a view to improving credit and expanding the rural economy; operationalizing the Liberia Land Authority to improve land governance including land administration and management. The PAs were marginally relevant to the topics of land reform and improving agricultural credit and could have been defined in much stronger terms to help achieve the PDO. It is not clear for example, how establishment of another government agency in an extremely weak capacity environment would directly promote land reform. Policy reform measures were limited to adopting a framework for reform only and it is not clear whether any concrete measures were taken in this regard through the life of the series. The relevance rating for this area is Moderately Satisfactory.

Overall, relevance of PAs for achievement of the PDO on addressing key constraints to growth is rated Satisfactory.

PDO 3: Improving human capital development. The initial focus of this PDO was on the education sector; health was added at PRSDPO-III stage with the onslaught of the Ebola epidemic. Each sector included 2 PAs.

3.1. Education. 2 PAs in this area included measures for adopting a comprehensive, fully costed implementation plan for teacher recruitment, training and deployment; and a framework for equitable resource allocation by region and pupil's poverty status. The PAs were only partially relevant for achieving the much broader PDO on improving access to education. Rating: Moderately Satisfactory.

3.2. Health. 2 PAs in this area included measures to improve budget execution in the health sector: conducting a half-year budget execution review; and approving a plan to improve efficiency in the use of domestic and external resources for the health sector. How the PAs link to the PDO on improving access to health is not clear, as increased spending does not necessarily translate into better outcomes by itself, and in the environment of low capacity can be wasteful. The projects documents do not specify how this is linked and rationale provided is weak. The PAs in this area would be a much better fit in the area on PFM, as they have little, if any, connection to health outcomes. Rating: Moderately Unsatisfactory.

The overall relevance rating for PAs intended to achieve the PDO 3 is Moderately Satisfactory.

The overall rating for relevance of PAs for the program is Moderately Satisfactory, derived from the below ratings for each PDO PAs relevance.

Table 2. Rating of Relevance of Prior Actions

PDOs	**Areas**	**PA relevance rating**
1. Strengthening governance	1.1. Transparency and Accountability	Moderately Satisfactory
	1.2. Civil Service Reform	Satisfactory
	1.3. Tax and Customs Administration	Satisfactory
	1.4. Public Financial Management	Satisfactory
	1.5. Procurement	Moderately Unsatisfactory
	Overall PDO PA Rating	**Moderately Satisfactory**
2. Addressing key constraints to growth	2.1. Energy	Satisfactory
	2.2. Agriculture and Land	Moderately Satisfactory
	Overall PDO PA Rating	**Satisfactory**
3. Improving human capital development	3.1. Education	Moderately Satisfactory
	3.2. Health	Moderately Unsatisfactory
	Overall PDO PA Rating	**Moderately Satisfactory**
Overall PRSDPO series:		**Moderately Satisfactory**

Rating

Moderately Satisfactory

4. Relevance of Results Indicators

Rationale

This PRSDPO series contained a high number of indicators, reflecting the broad sectoral coverage of the program.

PDO 1: Strengthening governance

1.1. Transparency and Accountability (Relevance rating Moderately Satisfactory). Key RIs in this area included:

- *Number of Currency Transaction Reports (CTR) and Suspicious Transaction Reports (STR) issued by the FIU*. This RI was relevant for measuring PAs 1.1.3., 1.1.4., and 1.1.6. (see Table 1) and was monitored throughout the series (PRSDPO I-IV). However, its initial targets were underestimated and later revised upwards, in case of CTRs quite significantly (from 50 to 100,000), less so for STRs (from 10 to 100). This indicates a design weakness in terms of poor quality of initial targeting.
- *Percentage of senior civil servants (directors and above) providing complete asset statement to LACC*. This indicator was relevant was measuring PAs 1.1.5. and 1.1.7. and monitored in PRSDPO II-IV. The targets were unchanged, albeit somewhat conservative (from baseline of 56% to target 75%) and could have been designed with higher target in mind, given the fact that only senior level civil servants were targeted.

1.2. Civil Service Reform (Relevance rating Satisfactory). There was only one designated RI in this area – *percentage of civil servants in grades 1-10 paid according to new pay structure* that was to measure PAs 1.2.1-3. The indicator was relevant, consistent (monitored in PRSDPO II-IV), and properly targeted (from baseline of 0 to 100%). At the same time, only one indicator (related to pay structure only) in all PRSDPO series was insufficient to properly measure success in reforming the civil service and reflect progress (or lack thereof) in PAs.

1.3. Tax and Customs Administration (Relevance rating Satisfactory). There were two RIs in this area, tracked in PRSDPO I, III and IV.

- *Percentage of ports where ASYCUDA is operational*. This indicator was relevant to PA 1.3.1., but the target was revised significantly downwards, from 100% in PRSDPO-I to 80% in PRSDPO-III and eventually to 55% in PRSDPO-IV. The ICR explains revisions by lack of necessary funds for infrastructure investment, possibly an indicator of design weakness.
- *Share of total Customs revenue captured by ports where ASYCUDA is operational*. This indicator was highly relevant to PA 1.3.1. and properly captured the intended objectives. At the same time, the baseline was already quite high (90%) and target revision from 100% to 95% somewhat diminished its eventual efficacy.

1.4. Public Financial Management (Relevance rating Satisfactory). This area included three RIs, relevant to PAs 1.4.1-9, all of which were tracked throughout the series. 2 indicators were revised, one downwards, one upwards, reflecting the achievement dynamics (according to the ICR):

- *Share of civil servants paid through the IFMIS solution* – a relevant and properly targeted indicator, from baseline of 0 to full coverage (100%).
- *Number of Ministries and Agencies in which IFMIS is installed and operational*. This indicator was relevant and well targeted. It was revised upwards reflecting progress on the ground, from 20+ to 50+, from baseline of 7.
- *Timing of submission of Annual Financial Statements to GAC (months after end of fiscal year)*. This indicator was also relevant and well-targeted. It was revised slightly downwards, reflecting new legislation requirements, from 3 to 4 months, with baseline of 12 months.

1.5. Procurement (Relevance rating Moderately Unsatisfactory). Two indicators in this area were tracked in PRSDPO II-IV, one was revised upwards due to faster than expected progress (eventually also exceeded):

- *Number of trained and certified procurement analysts appointed in the civil service.* This indicator measured PA 1.5.1., and was revised upwards from 100 to 120, with baseline of 0. Relevance of this indicator was weak, as number of trained and certified specialists – while an overall welcome development - does not generally reflect the improvement of procurement systems, particularly for an extended series. A better indicator would have been the share/volume of public procurement conducted through better (more transparent and competitive) practices.
- *Publication of annual Compliance Monitoring Report (CMR) by the PPCC.* Similarly, this indicator, reflecting the fact of a publication, is not able to show any qualitative improvement in procurement practices. It was supposed to measure PA 1.5.3.

PDO 2: Addressing key constraints to growth (electricity and land)

2.1. Energy (Relevance rating Satisfactory). Three RIs in this area were consistent, tracked in PRSDPO II-IV, with only one slight revision upwards, reflecting progress. Except for the indicator on cost of electricity, which does not mention the issue of subsidy (or absence thereof), a others were relevant and well-targeted, reflecting progress in important areas such as improved access to and reduced cost of electricity through use of more efficient fuel. At the same time, the links of these RIs to the PAs (2.1.1.-2) are not obvious.

- *Cost of electricity to end users*/KWH(US$) 0.55 - 0.40.
- *Urban access to electricity* (number) 12,742 - 50,000 (revised upwards to 60,000)
- *Share of energy produced from high cost diesel*, baseline of 100%, target 20%.

2.2. Agriculture and Land (Relevance rating Moderately Satisfactory). This area was covered by three RIs. Indicators were somewhat relevant, but rather weak in measuring the achievement of the related PDO.

- *Share of commercial bank credit to the agriculture sector* (%). This RI was supposed to measure improvement in access to finance in agriculture, reflecting the effectiveness of PA on establishing a collateral registry, but the target was very modest (from baseline of 3.7% to 5.5%) and modestly relevant in that sense, although it was tracked in three PRSDPOs (II-IV).
- *Land parcels with use and ownership rights recorded under new policy*. This RI was introduced (but not defined in terms of target) at PRSDPO-I, and then reappears at PRSDPO-III, with target of 100 (from the baseline of 0). The RI was revised and reformulated at PRSDPO-IV (as below).

- *Legacy and new deeds digitized*. This indicator replaced the earlier one on land parcels (according to ICR to better match the PA) and was introduced at the very end of the series in PRSDPO-IV. It was more ambitiously targeted (50,000 for legacy deeds and 10,000 for new deeds, from baseline of 0 for both), but represented a measurement of a much more modest action aimed at agriculture and land reform, perhaps reflecting a “low-hanging fruit” at the end of the series.

PDO 3: Improving human capital development (access to education and health)

3.1. Education (Relevance rating Moderately Satisfactory). Achievements in this area were measured by a set of related indicators on school (primary, and junior and senior secondary) net enrollment rate, tracked in PRSDPO II-IV. The indicators were well defined, targeted, and linked to the PDO on access to education. At the same time, they were poorly associated with the PA on teacher recruitment, training and implementation. A better or additional RI could have been one associated with teacher absenteeism, etc.

3.2. Health (Relevance rating Moderately Unsatisfactory). Two indicators related to health appeared only in PRSDPO-III, and measured health budget execution rates (recurrent and capital). Their relevance to the PDO on access to health services is weak, as increased spending in an extremely weak institutional capacity environment easily could easily translate into more waste of resources and inefficiencies and can potentially trigger more corrupt behavior in the absence of mitigating measures. The PDs and ICR do not explain how these basically PFM-related indicators are linked to the overall PFM reform agenda supported by the series. Targets are only partially defined (for example, recurrent budget execution rate aims at anything more than current rate of 96% - which is already high.

Table 3. Rating of Relevance of Results Indicators

PDOs	**Areas**	**Results Indicators relevance**
1. Strengthening governance	1.1. Transparency and Accountability	Moderately satisfactory
	1.2. Civil Service Reform	Satisfactory
	1.3. Tax and Customs Administration	Satisfactory
	1.4. Public Financial Management	Satisfactory
	1.5. Procurement	Moderately Unsatisfactory
	Overall PDO RI Rating	**Moderately Satisfactory**
2. Addressing key constraints to growth	2.1. Energy	Satisfactory
	2.2. Agriculture and Land	Moderately Satisfactory
	Overall PDO RI Rating	**Satisfactory**
3. Improving human capital development	3.1. Education	Moderately Satisfactory
	3.2. Health	Moderately Unsatisfactory

	Overall PDO RI Rating	**Moderately Satisfactory**
Overall PRSDPO series RIs relevance:		**Moderately Satisfactory**

Rating

Moderately Satisfactory

5. Achievement of Objectives (Efficacy)

OBJECTIVE 1

Objective

Strengthening governance.

Rationale

Efficacy rating: Moderately Satisfactory. This PDO was spread across many diverse (often interconnected) technical areas. In some areas relevance of PAs and RIs was uneven, thus making it difficult to connect inputs and outputs to achievement of results. The ICR aggregates the number of RIs by level of achievement, concluding with a rating of MS on that basis (11 RIs, 5 achieved, 5 partially achieved, 2 not achieved), which does not necessarily provide a fully nuanced picture. In addition, the ICR breaks the results in this area in two blocks: procurement and everything else, which is not representative of the relative effort spent in each area. This validation revisits each specific area and accords overall rating based on relative importance of each of them within the series as a whole (areas such as PFM and Tax and Customs in particular), reflected in supporting PAs and other efforts (ASA), as detailed in the PD.

1.1. Transparency and accountability: despite the broad title, the focus of PAs was on AML/CFT-related regulations and disclosure of civil servants' assets through the LACC. Progress was tracked with the help of two relevant and measurable indicators (one was drastically revised upwards based on actuals). In both cases targets were achieved. Overall, it is not clear however, how these new regulations and asset disclosure affected overall transparency and accountability situation in the country, and the ICR has no information on that. Efficacy rating: Substantial.

1.2. Civil Service Reform: similar to the previous area, its focus was narrow, and the PAs covered reforming the civil service pay structure only, with one RI. Despite being included in all PRSDPOs as a trigger and also as a PA, the target of 100% coverage was not achieved, with actual result of 4.2%. Efficacy rating: Negligible.

1.3. Tax and Customs Administration: this area PAs focused on rollout and operationalization of ASYCUDA in all ports of the country, plus updating customs regulations. Two RIs in this area were revised downwards in the aftermath of Ebola crisis, one of them quite significantly. Both were only partially achieved. Since the more important RI of total volume of customs revenue passing through ASYCUDA operated ports was rather high 93% (albeit from already high baseline of 90%), the final efficacy can be considered positive. Efficacy rating: Substantial.

1.4. Public Financial Management (PFM): interventions in this area focused on introduction and operationalization of IFMIS and timeliness of financial reporting. These actions were relevant for achieving progress in PFM overall, and results in some areas were impressive for weak capacity environment such as Liberia. All 3 RIs were well defined and consistently tracked, with one of results not achieved (share of civil servants paid through IFMIS, target 100%, actual 60%), and two others achieved (timely reporting and introduction of IFMIS in ministries). Efficacy rating: Substantial.
1.5. Procurement: interventions focused on introducing a career track for procurement officers within the civil service, and adoption of reform-oriented regulations. Out of 2 RIs targets in this area, one (publication of a compliance report) was not achieved, the other - number of trainees - exceeded the target. The PAs and RIs were only partially relevant, as the number of trained specialists does not necessarily indicate progress in the area of procurement. Efficacy rating: Modest.

Rating

Moderately Satisfactory

OBJECTIVE 2

Objective

Addressing constraints to growth.

Rationale

Efficacy Rating: Moderately Satisfactory. This PDO focused on infrastructure (energy and transport – the latter dropped early on) and land reform. Both areas were critical for addressing constraints to growth, with situation in energy (electricity) particularly abysmal. Overall, results were better defined and achieved in electricity sector.

2.1. Energy: PRSDPO series interventions in energy identified relevant areas for interventions and came up with generally realistic targets. It is understood that results in this area were achieved through a much broader set of actions and interventions, beyond the scope of the areas supported by the series, but nevertheless it is possible to see the contribution of the PRSDPO-supported PAs in this regard. RIs were well-defined and tracked consistently. All three RIs were achieved (one partially, after it was revised upwards – initial target was exceeded). Efficacy rating: Substantial.

2.2. Land and agriculture: PAs in this area pursued land reform through regulatory and institutional reform, including establishment of Liberia Land Authority and collateral registry. The two RIs were only marginally relevant to the PDO. According to the ICR, one RI was revised, but in reality it was dropped and replaced by another RI (from “land parcels used and recorded under new policy” to “number of deeds digitized”) – more modest in its ambition and relevance to the PDO, perhaps reflecting the difficulties in progressing the land reform. The second RI (on share of commercial bank lending to agriculture sector, baseline 3.7, target 5.5 and actual 4.8%) was very modest as well and its link to PAs was not obvious. Efficacy rating: Modest.

Rating

Moderately Satisfactory

OBJECTIVE 3

Objective

Improving human capital development

Rationale

Efficacy rating: Moderately Unsatisfactory. This PDO was revised halfway through the series by adding health sector (to education), with the onslaught of Ebola epidemic. Overall, education PAs and RIs appear better defined, more relevant and eventually more efficacious than in health sector.

3.1. Education: PAs focused on teacher recruitment and resource allocation in the education sector, while the RIs measured school attendance at various levels. The RIs were well-defined and measurable, yet the link between the RIs, PAs, and the PDO was not clear, as teacher recruitment is just one of possible measures to improve school attendance and overall access. Nevertheless, based on relevance of RIs to the PDO, and achievement of 3 out of 4 targets that were consistently tracked throughout the series, the efficacy rating is Substantial.

3.2. Health: this area was included at PRSDPO-III stage to mitigate the negative impact of the Ebola epidemic. However, neither the PAs (focused on improving health budget execution) not the RIs (2 RIs, measuring health budget execution rate) were directly related to the PDO. One of RIs was not achieved, and the other has no information provided in ICR. No information on access to health and its dynamic is provided in ICR. Efficacy rating: Negligible.

Rating

Moderately Unsatisfactory

Overall Achievement of Objectives (Efficacy)

Rationale

Overall achievement of objectives for this DPL series is rated Moderately Satisfactory, a sum of ratings of efficacy of all three PDOs. The objective on human capital development (health and education) was not well defined and many results were either incomplete of impossible to assess with the information provided. However, taking into account negative factors such as severe capacity constraints and exogenous shocks (Ebola outbreak and commodity price collapse), this rating does not diminish many positive achievements, which, together with some of the measures taken towards achievement of results in the future, can be assessed as steps in the right direction.

Overall Efficacy Rating

Moderately Unsatisfactory

6. Outcome

Rationale

These series aimed at helping the country to achieve important development objectives in several diverse and complex technical areas through an extended period of time that also coincided with the Ebola epidemic halfway through the program. The series were more successful in some specific subareas related to public sector governance (for example, transparency and accountability – introducing measures to promote AML/CFT activities; PFM – introducing IFMIS in key ministries and expediting financial reporting; and energy – reducing cost and expanding coverage of electricity services). The series were less successful in designing and monitoring a set of relevant actions and achieving results in such areas as agriculture financing and land reform, procurement reform, civil service reform (introduction of revised pay structure), and access to health services. In some cases, despite some positive results, their attribution to the measures supported by the series was not clear (for example, education – school attendance). The table below summarizes the ratings for overall outcome by aggregating ratings for PA Relevance and Achievement of Objectives/Efficacy, described in detail in earlier sections. The overall outcome rating of Moderately Satisfactory reflects many positives, as the program was able to promote positive results in several critical areas in an environment of low institutional capacity and an ongoing outbreak of an Ebola epidemic.

Table 4: Summary Outcome rating

PDOs	Areas	Efficacy	PA Relevance	Outcome
1. Strengthening governance	1.1. Transparency and Accountability	Substantial	MS	
	1.2. Civil Service Reform	Negligible	S	
	1.3. Tax and Customs Administration	Substantial	S	
	1.4. Public Financial Management	Substantial	S	
	1.5. Procurement	Modest	MU	
	Overall PDO 1	**Moderately Satisfactory**	**Moderately Satisfactory**	**Moderately Satisfactory**
2. Addressing key constraints to growth	2.1. Energy	Substantial	S	

	2.2. Agriculture and Land	Modest	MS	
	Overall PDO 2	**Moderately Satisfactory**	**Satisfactory**	**Moderately Satisfactory**
3. Improving human capital development	3.1. Education	Substantial	MS	
	3.2. Health	Negligible	MU	
	Overall PDO 3	**Moderately Unsatisfactory**	**Moderately Satisfactory**	**Moderately Unsatisfactory**
Overall PRSDPO series		**MS**	**MS**	**MS**

a. Rating

Moderately Satisfactory

7. Risk to Development Outcome

The ICR is quite candid in its assessment of elevated risks to sustainability of development outcomes, which are many in the case of Liberia: exogenous shocks, such as the Ebola outbreak; the sharp drop in global commodity prices; political risks associated with elections; lack of political will to implement wage bill reforms; ongoing governance challenges (delayed submission of financial reports to GAC); increasing revenue losses in the electricity sector, etc. The ICR mentions among mitigating measures the Government's agreement to a new IMF program, and several WB investment projects on governance and agriculture. In the light of the above risks and ongoing negative trends, this review suggests elevating the ICR assessment of the risks from *Substantial* to *High*.

8. Assessment of Bank Performance

a. Bank Performance – Design

Rationale

The project was clearly overburdened with multiple components and sectors, and its technical sophistication (e.g. introduction of IFMIS, ASYCUDA, pay reform, etc.) was too ambitious for the already overstretched and low capacity within the public sector in Liberia, which was later exacerbated by the Ebola outbreak. The Bank should have anticipated this in the design of the series. A shorter and more focused series would have been more appropriate given well known constraints. The program included three supplements, which possibly created an unwarranted expectation that more supplemental budget support would be forthcoming without additional progress on reform. The ICR claims that design of the series integrated lessons from the implementation of previous operations (Reengagement and Reform Support Program I-IV), as well as other WBG interventions such as the Economic Governance and Institutional Reform Project (EGIRP), the Integrated Public Financial Management Reform Project (IPFMRP), the Land Sector Reform Project; and the new three-year arrangement with the IMF under the ECF (2012) – and that these lessons were reflected in the choice of prior actions. The project documents identified these lessons in considerable detail, including the importance of such factors as ownership and political economy of reforms; focus, selectivity, and sequencing of reforms; capacity, etc.

The design of the program was underpinned by the considerable analytical work on a range of important policy issues (PEFA, PEMFAR, Growth Diagnostics, PER in HD sectors, Poverty Note), and benefited from sector dialogue covering reforms in the agricultural sector and the financial system. The results chain described in the project documents was uneven: some areas lacked clear and obvious links between PDOs, prior actions and RIs.

The initial assessment of risks to achievement of PDOs (moderate) was excessively optimistic. Although it is well understood that the Bank could not predict the Ebola outbreak and downward swing in global commodity prices, the overall FCV context and low institutional capacity warranted more elevated risks and more extensive efforts at mitigation, in addition to the IMF program and WBG investment projects. The operation grew in complexity despite the severe stress to the government systems introduced by Ebola outbreak half-way through the series. Rating: Moderately Satisfactory.

Rating

Moderately Satisfactory

b. Bank Performance – Implementation

Rationale

The Bank played an important and positive role in helping the Government to sustain reforms during the Ebola outbreak, including several rounds of supplemental and additional financing. Many important reforms, such as better financial reporting, energy sector measures, and the introduction of IFMIS were continued throughout the series. Program implementation was boosted by several concurrent activities, including investment projects, technical assistance and capacity building (EGIRP, IPFMRP, the Land Sector Reforms Project) and cooperation with the IMF during the five-year arrangement under the ECF. PRSDPO-I faced significant delays between approval and disbursement due to misunderstanding that could have been dealt with a better grasp of political economy peculiarities in the country. Triggers contained in the series were incorporated into PAs as planned, with very few minor deviations. Rating: Moderately Satisfactory.

Rating

Moderately Satisfactory

c. Overall Bank Performance

Rationale

Overall Bank Performance is rated Moderately Satisfactory, with Moderately Satisfactory rating for design, reflecting somewhat complex design of the series given the extremely low capacity environment; and Moderately Satisfactory for implementation, as despite overly complex design of the series, the Bank played an important role in helping the Government to sustain some of the reforms despite the severe external shocks of commodity prices and Ebola outbreak.

Overall Bank Performance Rating

Moderately Satisfactory

9. Other Impacts

a. Social and Poverty

The program contained measures with possible direct impact on poverty and welfare (access to cheaper electricity, improved access to education). Nevertheless, the poverty level in the country has been estimated to have increased during the program implementation, largely due to exogenous shocks of Ebola outbreak and commodity price fluctuation.

b. Environmental

The program did not contain any measures that could have had direct negative impacts on the environment. Some of the intended land reforms (tenure) could potentially have led to more sustainable land use. Similarly, improved efficiency as a result of energy sector reforms could eventually lead to reduced use of coal. These results remain to be seen.

c. Gender

The program did not refer to any gender-related goals or components neither in PDs nor in the ICR. References were made to Liberia being one of the last in the world on gender parity indices, and that the AfT referred to improving situation as one of its strategic goals. HD-related PDO includes RIs on equal access to education.

d. Other

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10. Quality of ICR

Rationale

The ICR is generally thorough and candid in its assessment of the program. It provides detailed description of the country context, including exogenous shocks which the country went through, and which affected the design and implementation of the program. The report provides detailed sector context overview, describing the main challenges which the program was supposed to help mitigate. Description of program pillars and areas provides generally enough details, although the last pillar on human development describes (very briefly) only the education area, without mentioning health.

The ICR does reflect on the changes made in PDOs, pillars, and RIs, but could have done so in more detail, as some of these changes and inconsistencies are not mentioned. In a few cases, there was difference in triggers and PAs, which the ICR did not track. The section on relevance of PAs contains enough details, is well-argued, and notes a few weaknesses (agriculture) - although in some cases it omits them as well (e.g. procurement, land reform, health). Similarly, the efficacy section notes a few but not all shortcomings on relevance, measurability, and appropriateness of RIs. Table 5 provides a detailed account of the evolution and achievement of RIs, with a few shortcomings: for example, there is no information on health budget execution rate, and in a couple of cases the assessment of being "partially achieved" appears too generous (civil service, agriculture credit). The analysis of efficacy is overall acceptable, with some exceptions, such as health, land reform, and procurement. The ICR provides sufficient information on other outcomes and impacts (poverty, environment), with the exception of gender – which could have been mentioned particularly in the context of the HD pillar. ICR assessment of risks to development outcomes includes a criticism of overly optimistic initial assessment, although this review finds that it could have been even more conservative in this regard. The ICR includes 4 broadly relevant and valuable lessons, although some of them could have better nuanced. Overall, the quality of the ICR is rated Substantial.

a. Rating

Substantial

11. Ratings

Ratings	ICR	IEG	Reason for Disagreement/Comments
Outcome	Moderately Satisfactory	Moderately Satisfactory	
Bank Performance	Moderately Satisfactory	Moderately Satisfactory	
Relevance of Results Indicators	---	Moderately Satisfactory	
Quality of ICR	---	Substantial	

12. Lessons

This review broadly concurs with the 4 lessons from ICR, and offers additional suggestions:

Lesson 1: Importance of sustained measures for good fiduciary practices to be ingrained in government operations, which also underscores the need for a thorough and systematic ex ante risk assessment of risks to achieving development objectives and articulation of mitigation measures. Excessively overburdening the fragile and low capacity system with complex technical reforms (IPSAS-based reporting, introduction of ASYCUDA and

IFMIS, payroll reform, etc.) is fraught with major risks to sustainability and the credibility of reforms in the long term, once there is no direct donor support and hand-holding.

Lesson 2: Need for good communication with all stakeholders from the start to avoid preparation and implementation delays. At the beginning of the series Parliament was not fully informed that the budget support was in the form of an IDA credit and not an IDA grant and needed additional assistance on how to ratify such agreements, which took additional 11 months between the Board approval and disbursement. In addition, an extended and sizable program such as this series would have benefited from a better upfront understanding of the political economy risks and scenarios.

Lesson 3: Need to keep the range of policy areas flexible, to better respond to exogenous shocks such as the Ebola crisis, which occurred after the start of the series and highlighted the weaknesses in Liberia's health care delivery system.

Lesson 4: Capacity for reform in countries like Liberia, requires heavy TA to support a successful reform program. The TA also encouraged stronger government commitment and willingness to reform. The key TA support was particularly helpful in the areas of PFM, land reform and in electricity sector reforms. At the same time, ongoing TA support for implementation (absolutely critical in an environment like Liberia) also needs to be accompanied by strong and clearly targeted capacity building measures and indicators to ensure sustainability of achievements.

13. Project Performance Assessment Report (PPAR) Recommended?

Yes

Please explain

Given the complexity and length of this programmatic series, including through the provision of supplemental financing, a more thorough assessment through a project performance assessment report (PPAR) is recommended. This is particularly relevant today since this series was implemented during an outbreak of highly infectious disease, and lessons learned could be useful for designing operations during and after the COVID-19 pandemic. A PPAR could also answer some sector-specific questions on relevance and efficacy that are difficult or impossible to address at the ICRR stage (energy, education, health, etc.). Another important aspect that a PPAR could address, would be the appropriateness of highly complex multi-sector series as an instrument to deal with critical developmental challenges in a low capacity environment. At the same time, the decision whether to undertake a PPAR should take into account the ongoing pressures on the country team related to COVID-19, and capacity constraints within the Government.