



## 1. Project Data

**Project ID**

P118779

**Project Name**

PK: Tertiary Education Support Project

**Country**

Pakistan

**Practice Area(Lead)**

Education

**L/C/TF Number(s)**

IDA-48860,IDA-48870

**Closing Date (Original)**

31-Dec-2015

**Total Project Cost (USD)**

2,015,000,000.00

**Bank Approval Date**

24-Mar-2011

**Closing Date (Actual)**

30-Jun-2017

**IBRD/IDA (USD)**
**Grants (USD)**

Original Commitment

300,000,000.00

0.00

Revised Commitment

224,347,172.46

0.00

Actual

211,586,514.65

0.00

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## 2. Project Objectives and Components

### a. Objectives

According to the appraisal document (p. 9) and Financing Agreement (p.5), the development objectives were “to improve the conditions of teaching, learning, and research for enhanced access, quality, and relevance of tertiary education”. For the purpose of this review, the objectives whose efficacy is assessed are: (1) improved conditions of learning, (2) improved conditions of research and (3) enhanced access. Improvements in quality, teaching, and relevance are considered to be part of the objective of improved learning, as learning is the higher level objective to which quality, teaching, and relevance contribute.



**b. Were the project objectives/key associated outcome targets revised during implementation?**

No

**c. Will a split evaluation be undertaken?**

No

**d. Components**

There were two components:

Component 1: Program Financing (appraisal US\$280 million; closure US\$212.2 million) provides resources for six higher education budget items or Eligible Expenditure Programs (EEPs): PhD student scholarships; tenure-track staff salaries; recurrent grants to universities; National Research Program for Universities; International Research Support Initiatives Program and Pakistan Education Research. To improve financial sustainability and effectiveness in expenditures, Higher Education Institutions (HEIs) seek diversified sources of funding. To improve the quality and relevance of teaching and research the following activities are supported: replacement of a foreign scholarship with an indigenous one; faculty placement program; PhD scholarship program; strengthening of the tenure track program; implementation of faculty development program to improve pedagogical skills of faculty; and implementation of a curricula revision program; and research funding on a competitive basis (among others). To improve equitable tertiary access among lower socio-economic students, a number of interventions are undertaken such as: scholarship, scaling-up distance education, selective expansion of physical facilities, and student loan program. To strengthen higher education management and governance, a Higher Education Management Information System (HEMIS) and fiduciary controls were to be implemented.

Component 2: Capacity Building, Policy Design and Monitoring and Evaluation (M&E) (appraisal US\$ 20 million; actual US\$ 10 million) finances technical assistance and capacity building activities for the Higher Education Commission (HEC) and Higher Education Institutions. Topics include: financial management and procurement, monitoring and evaluation, and policy and sector coordination (for HEC). Limited funds are allocated for office equipment and furniture for HEC.

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

**Project Cost:** Total project costs were US\$ 222.18 million, instead which was 74% of the planned US\$ 300 million, which was 74% of the amount. US\$ 77.82 was cancelled during the December 2013 restructuring, as a result of non-achievement of disbursement-linked indicators (ICR p. 23). Thus, spending per component was significantly lower than planned with 76% for program financing and 50% for capacity building; however, the estimated total after the cancelation was totally disbursed (ICR p. 16).

**Financing:** The investment operation was financed solely by an IDA credit.

**Financing:** The investment operation was financed solely by an IDA credit.

**Borrower Contribution:** The Borrower made no contributions, nor were any planned.

**Dates:** The operation was expected to close on December 31, 2015, but closed on June 30, 2017- 18 months later than planned. The operation was restructured on December 2013, which changed targets



of disbursement-linked indicators and changed the legal covenants, implementation schedule, and resource allocation among components. A second restructuring occurred December 2015 to extend the closing date of the operation. A split rating is not warranted and is not applied to calculate the outcome rating, as outcome targets were not revised.

### 3. Relevance of Objectives

#### Rationale

There were many challenges in the tertiary education sub-sector. Pakistan's higher education enrollment was low (5%), in comparison to other neighboring countries (World Bank 2011). Participation in higher education was a privilege shared predominantly amongst higher income groups. Moreover, there were large regional and spatial differences in enrollment ( i.e. 2% enrollment in Balochistan to 6% enrollment in Punjab and Sindh; with 3.8% enrollment in rural areas compared with 8.8% in urban areas). There were concerns with the quality of teaching and research. There were shortages of faculty, outdated curriculum, and lack of library/computer facilities and the higher education sub-sector was underfunded.

The Government developed a Medium-Term Development Framework for Higher Education (2005-2010) to guide its strategy and priorities, which was then updated (2010-2015). The Framework aimed at increasing access to tertiary education, improving the quality and relevance of learning and research, and strengthening governance and management.

The World Bank's Country Partnership Strategy (2010-2013) at the time of preparation emphasized human development and improving both equitable access and quality at all levels of education (p.27). The World Bank's Partnership Framework (2015-2019) at project closure emphasized service delivery in education (including higher education) and inclusion to reach the poor and those not served (p. i). The World Bank Group's Partnership Strategy specifically focused on governance and transparency, characteristics loosely associated with this project. Cross-cutting issues (i.e. governance and management) underpinning the higher education system were not explicit objectives in the operation, but were part of supported components.

The objectives of this operation substantially aligned with the Government's priorities in its Framework and the World Bank's Country Partnership Strategy at the start and throughout the life of the project. There were aspects not included in the objectives, yet contained in the Bank's Strategies and Government's Framework, suggesting minor misalignments in limited areas, consistent with a rating of substantial. In addition, the objective - improved conditions of learning- was vague, thus making it difficult to monitor.

#### Rating

Substantial

### 4. Achievement of Objectives (Efficacy)



## Objective 1

### Objective

Improved (conditions of) learning

### Rationale

The operation took an approach of improving quality, relevance, teaching, and learning of tertiary education by supporting the Medium Term Development Framework for Higher Education (MTDF-HE), rather than specific interventions. Thus, the underlying theory of change (ICR p. 8) can be interpreted as focusing on management and governance as a means to improve performance of the HEC and HEIs (including Affiliated Colleges), which may improve the conditions of teaching and eventually learning for students in higher education institutions. The indicators were loosely aligned with the objective. The indicators measured the components of *enhanced program financing at the tertiary education system and improved capacity building policy design and monitoring and evaluation*- disbursing against the achievement of six Disbursement-Linked Indicators (DLIs) and two indicators (i.e. number of faculty, and number of QEC) (ICR p 9-10).

### Outputs

- The number of faculty members on the Tenure Track System increased from 849 in 2011 to 3,838 in 2017, which exceeded the target of 2,149. The completion report indicated that this indicator was used to gauge the enhanced functioning and efficiency of the faculty members (p. 51). This was a disbursement-linked indicator.
- The number of assessed affiliated colleges that successfully completed all capacity building activities was 102, which met the revised target (102) but not the original target (800). The ICR notes the original target was partly related to an inappropriate benchmarking instrument, but the new target raises suspicion that it was adjusted to what was met. The ICR explained that this indicator measured institutions that work with students who complete 12th grade and have an impact on preparation and quality of students who subsequently enter HEIs.
- Student-to- full time faculty ratio in public universities decreased from 93 in 2011 to 74 in 2017, compared with the original (and revised) target of 88. While the ICR indicated that this was a ratio of students to faculty holding PhDs in public universities (p. 52), it did not explain how a decrease in the ratio improved quality.
- The number of academic programs accredited by Accreditation Councils established by HEC increased from 60 in 2011 to 1027 in 2017, which exceeded the original/revised target (400). This was a disbursement-linked indicator.
- The number of HEIs assessed against Institutional Performance Evaluation Standards was 25, which was higher than the revised target of 13. (The original target was 60). This was a disbursement-linked indicator.
- The number of undergraduate or graduate programs revised was 128 by the end of the project, which exceeded the original/revised target of 45. Lacking within the indicator was a mechanism to monitor implementation of the HEI (ICR p. 52). The ICR did not describe the process of revising the programs, nor type of programs revised.
- The number of QECs performing satisfactorily (based on scorecard) was 90, which exceed the target (45). The total number of QECs established and supported was 147. This was a disbursement-linked



indicator.

- The number of private TEIs eligible for public support as per approved policy increased from 7 in 2011 to 29 in 2017, which fell short of the original/revised target (31). The ICR does not explain the metric (i.e. percentage or number of institutions). The ICR did not explain what type of public support -- financial, monitoring, regulating, or technical assistance -- was provided to eligible institutions. Given the growing number of private institutions, efforts to regulate and monitor could support the project's objective of improved learning/teaching.
- Enhanced quality education for masters' level external students increased from 0 in 2011 to 12 in 2017, which exceeded the original/revised target (6). The ICR did not explain what was done to enhance the quality of education and how the enhanced quality was measured. The ICR also did not explain the metric (students, percentage, etc.) nor define "external students" to better understand this indicator. This was a disbursement-linked indicator.
- The ICR indicated that an Employer Perception Survey was conducted, but findings from the survey -- which might have provided evidence of improved educational relevance or learning -- were not presented.

Other indicators related to management and financing of higher education, which suggested varying achievement of other outputs that may have improved the conditions for teaching and learning:

- 278 administrators in affiliated colleges participated in management training, which exceeded the revised target (102) but did not meet the original target (750).
- A Public Expenditure Tracing Survey was completed during the operation. The ICR did not present findings from the survey or describe how the data were used to improve management.
- 70 public HEIs had improved strategic management, planning, and accountability, which met the target. The ICR did not describe how this indicator was assessed and verified. Yet, it was a disbursement-linked indicator.
- Budgetary allocation of the Higher Education Commission (as percentage of GDP) increased from 0.25 in 2011 to 0.30 in 2017. This was a disbursement-linked indicator.
- The number of administrators in affiliated colleges participating in management training was 278, which exceeded the revised target (102), but not the original target (750).
- The number of public HEIs with a fully functional Campus Management Solution Module was 8, which fell short of the original (and revised) target of 38.
- 4992 staff from HEC, HEIs, or provincial education offices participated in development programs.

### Outcomes

The completion report (p22-24) provided thin justification for lowering the targets (particularly disbursement-linked ones), but the team clarified that the adjustments to the DLIs did in fact move the project forward. The attainment of the outputs suggests there was substantial improvement in the conditions of learning.

### **Rating**

**Substantial**



## **Objective 2**

### **Objective**

Improved conditions of research

### **Rationale**

There were few activities directly supporting research, instead they were more focused on diversifying the financing. As described in the ICR (p. 9-10), the indicators were: enhanced program financing at the tertiary education system level as measured by the diversification of sources of funding, including self-generating income and improved capacity building policy design and monitoring and evaluation; strengthening the relevance and value added of research undertaken in HEIs; establishment of ORICs to liaise with the industry and to facilitate the development of technology incubators at selected HEIs. Thus, the Theory of Change did not appropriately link activities and outputs to demonstrate achievement of the objective.

### **Outputs:**

- The number of technology companies established/incubated in Higher Education Institutions increased from 12 in 2011 to 180, which exceeded the original/revised target (45).
- The number of institutions (ORICs) that performed satisfactory (based on scorecard and confirmed by third party validation) was 41, which exceeded the target (15). The ICR noted that this indicator allows for determination of the linkage between the research/incubators and industry demand. This was a disbursement-linked indicator.
- 180 companies were incubated in Higher Education Institutions, which exceeded the target (45). The completion report did not explain how these incubators were connected with students or faculty to improve their learning or research.
- Share of universities' self-generated revenues in overall resources increased from 44% in 2011 to 48% in 2017, which exceeded the original/revised target (46).

The ICR provides output data that suggests a modest improvement in the conditions of research.

### **Rating**

Modest

## **Objective 3**

### **Objective**

Enhanced access

### **Rationale**

Achievement of improved access was adequately aligned with outputs related to the supported activities, such as expansion of physical facilities, scaling up of distance education facilities in public and private



universities, and financial aid programs. It should also be pointed out that the activities across the objectives are inter-linked. These outputs were adequately measured by the indicators and DLIs (i.e. number of students, number of students benefiting from financial aid program, including a needs-based scholarship program).

Outputs:

- The number of students in public and private Higher Education Institutions increased from 46,803 in 2011 to 867,562 in 2017, which exceeded the target (604,803). The ICR did not discuss the role of the project within the context of a pre-existing trend of increasing enrollment, nor did the ICR provide a breakdown of enrollment by private and public (over time), as the project predominantly supported public HEIs.
- The number of new postgraduate foreign scholarships increased from 300 in 2011 to 1,491 in 2017, which fell short of the original (and revised) target of 2250. The ICR noted that the percentage of recipients returning after completing studies was tracked, but that information was not reported (p. 52). The ICR did not provide a breakdown of who benefited (region, gender, socio-economic group), nor did the ICR explain why the target was not attained or whether falling short of the target was related to implementation weaknesses.
- The number of new postgraduate indigenous scholarships awarded increased from 700 in 2011 to 3800 in 2017, which exceeded the original (and revised) target of 3000. This was a disbursement-linked indicator.
- The number of students receiving financial aid increased from 1000 in 2011 to 20,161 in 2017, which exceeded the original target (6,000). The ICR did not provide disaggregated data to be able to detect the project contribution to increasing enrollment among women and low income students. The ICR (p. 36) noted that the student loan program never “got off the ground” and was removed at restructuring. This was a disbursement-linked indicator.

While the ICR only provided output data, the data suggest substantial improvement in more students enrolling in higher education. The output data are also an initial step- access-, and necessary condition for learning.

### **Rating**

Substantial

### **Rationale**

Overall efficacy is rated substantial, as achievement of one objective was rated modest and the remaining two were rated substantial.





## Overall Efficacy Rating

Substantial

### 5. Efficiency

The completion report stressed value for money in terms of the interventions supported- higher education and financial aid program. The economic rate of return was 14%, based on a 10 percent discount rate (p. 17, 46, 47). The Net Present Value ranged from US\$705 million to US\$ 1.79 billion, thus the completion report concluded there was substantial economic rationale and viability to the project interventions (p. 47). The assumptions (about benefits and costs) underlying the economic assessment were appropriate. Among the benefits, lifetime earnings and the wage premium derived from higher education were calculated with household survey data, but this would not explain the productivity gains from the project.

The completion report did not stress operational efficiency. Instead, information contained in the completion report suggested project inefficiency. For example, total project costs were US\$ 222.18 million, instead of the planned US\$ 300 million, which was 74% of the amount. US\$ 77.82 million was cancelled during the December 2013 restructuring, as a result of non-achievement of disbursement-linked indicators (ICR p. 23). The project was extended for 18 months and by that time all project activities were completed. Considering all of these factors and the solid economic analysis, project efficiency is rated substantial based on both administrative and economic efficiency.

## 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 <input type="checkbox"/> Not Applicable
ICR Estimate	✓	14.00	100.00 <input type="checkbox"/> Not Applicable

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

### 6. Outcome

Relevance of objectives was substantial. Achievement of objective 2 (Improved conditions of research) was modest due to insufficient evidence on different outcome measures, while achievement of objective 1 (Improved





[conditions of] learning) and of objective 3 (Enhanced access) were rated as substantial. Overall efficacy was rated Substantial. Efficiency was rated substantial. Thus, the overall outcome is rated Satisfactory, which reflects minor shortcomings in preparation and implementation of the project.

**a. Outcome Rating**  
Satisfactory

## **7. Risk to Development Outcome**

While the Government and HEC have established the Vision 2025 for Higher Education, there continues to be several risks to the development outcome. Uncertainty about responsibility of higher education remains, because the devolution of responsibility for higher education leaves the authority and mandate of the Higher Education Commission unclear. HEIs and Affiliated Colleges have weak capacity, as noted in the completion report. Security in the country poses a threat. Security concerns could reduce the financial resources currently devoted to Higher Education, which is estimated at 2 percent of GDP (ICR p. 29). Government and country factors such as fiscal deficit, energy shortages, low tax base, and risk of natural disasters could further constrain resources to Higher Education. All of these factors result in substantial risk to the development outcome.

## **8. Assessment of Bank Performance**

**a. Quality-at-Entry**

Helpfully, the project's design focused on all segments of the higher education system: public, private, and affiliated colleges, rather than focusing exclusively on public institutions.

A prior sectoral assessment was utilized during preparation; this sectoral assessment assisted in the selection of the institutional and implementation arrangements; in selecting the key issues to be addressed in the operation; and to select the lending instrument (ICR p. 19). Assessments for fiduciary and procurement requirements were conducted. The completion report suggested that an updated assessment of HEC and HEIs (including Affiliated Colleges) would have been warranted, as the prior one underestimated capacity, which negatively impacted implementation (ICR p. 20).

Preparation was aided by strong Government ownership and a champion within the HEC (ICR p. 19).

The design team resolved a fund transfer issue, by reaching an agreement that the Ministry of Finance would transfer money to the HEC for the implementation of component two and the Bank would reimburse the Government against evidence of eligible expenditures. The complexity of this arrangement was not fully assessed and mitigated during preparation. Likewise, another aspect not fully considered was the Government's constrained resources, and the ICR argued this should have been considered in relation to some of the disbursement-linked indicators (ICR p. 3) and targets (p. 25). As a result, targets were lowered to facilitate achievable results (ICR p. 23), which brings to question how well the DLIs were formulated and actually stimulated results.



## **Quality-at-Entry Rating**

Moderately Unsatisfactory

### **b. Quality of supervision**

Supervision was facilitated by a strong working relationship between the Bank team, the HEC, and the Ministry of Finance (ICR p. 19). It was also facilitated by continuity of the task team leader (TTL) (same one during preparation and then replaced with the other co-TTL). One of the TTLs was located in Islamabad, which allowed for closer contact with the Government and Implementing Agency. There was adequate supervision on the part of the Bank team with missions visiting HEIs and Affiliated Colleges. The Bank team found solutions to the Government's insufficient release of funds to the HEC to implement the operation, which were related to the Government's macro-fiscal situation (ICR p. 21). There were two level two restructurings, which mitigated implementation challenges. During the latter portion of the project, the Bank team intensified its supervision. During restructuring, targets were lowered for disbursement-linked indicators "to focus on achievable results (ICR p. 23) and meet the Higher Education Commission's medium-term goals". The Bank team utilized the supervision rating to highlight implementation issues. Given the delays in carrying out studies (i.e. baseline survey of higher education and quality of services), some were dropped during restructuring. There were insufficient personnel in HEC, as well as multiple changes in the personnel of the HEC (i.e. Executive Director, advisers, and director generals). To address this, the Bank team developed a training support plan in 2013 for HEC and HEI staff.

## **Quality of Supervision Rating**

Moderately Satisfactory

## **Overall Bank Performance Rating**

Moderately Satisfactory

## **9. M&E Design, Implementation, & Utilization**

### **a. M&E Design**

The results framework contained 22 indicators (i.e. disbursement-linked, key performance, and intermediate outcome). Most of the indicators were aligned with improving management and quality, but they lacked sufficient detail on illustrating enhanced access, learning, and research. Targets related to student benefits from financial aid or enrollment targets were not disaggregated, which would be needed to demonstrate which groups had enhanced access. The completion report noted the level of ambitiousness of some targets such as *ACs meeting minimum quality standards*, number of administrators in ACs participating in management training; and number of HEIs assessed against institutional performance evaluation standards. The completion report also suggested inadequacy of some of the indicators (p. 54). Thus, there were a number of weaknesses in the design of monitoring and evaluation.



## **b. M&E Implementation**

Prior to restructuring, the monitoring and evaluation system was rated as unsatisfactory or moderately unsatisfactory by the Bank because of incomplete and delayed data and reporting. This was the result of the delays in filling key staff positions related to M&E, which had a negative impact on third-party verification for DLIs and targets. This was also the result of low capacity for monitoring and evaluation functions (ICR p 23 and 25) within the Implementing Agency. Once these issues were resolved, the quality of monitoring and evaluation improved and reports were submitted in a timely fashion.

Ratings for monitoring and evaluation were moderately satisfactory or satisfactory (after M&E staff were hired), based on the Bank's supervision reports. Nine studies were completed during the operation (i.e. Public Expenditure Tracing Survey, Employer Perception Survey, Student satisfaction survey), but other studies were cancelled (i.e. baseline study of HEIs and impact study on learning and labor market outcomes) (ICR p. 25). The completion report did not draw upon completed evaluations, thus, it is not clear the extent to which the cancellation of the remaining studies was a shortcoming.

During implementation, a number of targets (particularly DLI) were lowered. Some targets appeared to be set on what had already been delivered. The ICR (p. 23) stated that targets were lowered for disbursement-linked indicators "to focus on achievable results".

There were many data challenges for the HEIs - the lack of data specialists and lack of technology, which impacted the reliability of student enrollment data.

## **c. M&E Utilization**

The completion reports noted that utilization of monitoring and evaluation (p. 26) was necessary because of the validation required for the disbursement-linked indicators. However, the completion report did not discuss how the reports were used, nor how any of the studies completed were utilized to improve management, quality, research, learning, or access. However, the ICR does note that "it was hoped that the findings would be factored in the design of the follow-up operation" (ICR p. 25).

### **M&E Quality Rating**

Modest

## **10. Other Issues**

### **a. Safeguards**

Two safeguard issues were triggered at entry: Environmental (OP4.01) and Disputed Areas (OP 7.60). An Environmental and Social Management Plan (ESMP) was developed. The completion report points out that there was weak compliance with this plan before 2014. Lack of compliance was related to issues at both HEC and HEIs in their implementation of the ESMP during construction, renovation, and rehabilitation



of buildings financed with counterpart funding. The provision of training improved compliance and monitoring (ICR p. 26). The completion report (p. 26) did not report how the Bank monitored Disputed Areas. This point was subsequently clarified with the team who confirmed compliance with the appropriate safeguard.

## **b. Fiduciary Compliance**

During preparation, an assessment was conducted of the financial arrangements including staffing, accounting, internal controls, and audit arrangements. The assessment concluded that these arrangements were satisfactory. There were delays with some of the financial reporting. The ICR did not state whether all audits were “clean”, thus falling short of confirming financial compliance.

The procurement capacity assessment of HEC (i.e. organization structure, procurement procedures and practices, procurement staff) identified risks that were mitigated by requiring the Secretariat to appoint two dedicated procurement specialists prior to disbursement, training in Bank procurement processes, and maintenance of a publicly accessible procurement website and records. None of these measures were addressed in a timely fashion. As a result procurement of technical assistance was delayed, but procurement of goods was not. The relationship between the Secretariat and the HEC Directorates contributed to delays (ICR p. 27). This was in addition to a shortage of qualified procurement staff.

## **c. Unintended impacts (Positive or Negative)**

None

## **d. Other**

None

## **11. Ratings**

<b>Ratings</b>	<b>ICR</b>	<b>IEG</b>	<b>Reason for Disagreements/Comment</b>
Outcome	Satisfactory	Satisfactory	---
Bank Performance	Satisfactory	Moderately Satisfactory	There were weaknesses in preparation, which negatively impacted implementation, thus quality at entry was rated moderately unsatisfactory. In accordance with the harmonized guidelines, when



			there is split between entry and supervision, the outcome rating determines the overall performance rating.
Quality of M&E	Substantial	Modest	There were shortcomings in design, implementation, and utilization of M&E.
Quality of ICR		Substantial	---

## 12. Lessons

The ICR (p. 29-30) provided a number of lessons, which IEG has synthesized and prioritized as follows:

**Shifting the higher education sector to an accountability-oriented model will require better monitoring and evaluation data.** The prior operation began the process of focusing on accountability that was continued with this project and a follow-on investment. The completion report suggested the importance of allocating public recurrent and development grants based on observable and measurable outcomes, which implies a need for better monitoring and evaluation indicators than were utilized in this operation.

**Stronger preparation may have facilitated better implementation, as issues not resolved were bottlenecks to implementation.** An updated capacity assessment of HEC was not conducted at entry - thus, capacity was overstated. Clarity was also lacking on how to operationalize the budgetary transfer of money from the Ministry of Finance to the Secretariat. As a result, technical assistance and implementation were delayed. The Operational Manual was provided to the Bank a year after effectiveness.

## 13. Assessment Recommended?

No

## 14. Comments on Quality of ICR

The completion report was well written, but repetitive. The report detailed factors that impacted implementation and critiqued weaknesses, providing useful insights. However, the report provided limited analytical discussion of efficacy and the contributions of this project to the attainment of the objectives. It relied heavily upon project indicators with limited discussion of them and presented no additional data or evaluative evidence to justify its claims. Nine studies were completed during the operation (i.e. Public Expenditure Tracing Survey, Employer Perception Survey, Student satisfaction survey), but the ICR did not describe findings from them, thus limiting the validity of its conclusions. It also neglected to provide enrollment trends and enrollment data disaggregated by public and private HEIs, given the pre-existing trend of rising enrollment. IEG clarified with the Bank team aspects that were unclear in the completion report.



**a. Quality of ICR Rating**  
Substantial