



1. Project Data

Project ID
P174033

Project Name
UG COVID-19 Education Response Project

Country
Uganda

Practice Area(Lead)
Education

L/C/TF Number(s)
TF-B3597

Closing Date (Original)
31-Dec-2021

Total Project Cost (USD)
14,700,000.00

Bank Approval Date
29-Aug-2020

Closing Date (Actual)
31-Dec-2021

| | IBRD/IDA (USD) | Grants (USD) |
|---------------------|-----------------------|---------------------|
| Original Commitment | 14,700,000.00 | 14,700,000.00 |
| Revised Commitment | 14,700,000.00 | 14,700,000.00 |
| Actual | 14,700,000.00 | 14,700,000.00 |

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2. Project Objectives and Components

a. Objectives

According to the Project Appraisal Document (PAD) (p. 1) and the Financing Agreement of September 14, 2020 (p. 4) the objective of the project was “to support students learning in pre-primary, primary and lower secondary during school closures associated with the COVID-19 pandemic and ensure a safe reopening and student reentry”.



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

No

c. Will a split evaluation be undertaken?

No

d. Components

The project included three components:

Component 1: Ensure learning during school closure and prepare for school reopening (appraisal estimate US\$7.63 million, actual US\$7.40 million): This component was to finance two sub-components:

Sub-component 1.1: Supporting continuity of learning: This sub-component was to finance: i) Developing self-study materials for continuity of learning; ii) Providing printing equipment for the National Curriculum Development Center (NCDC); iii) Printing and distributing self-studying materials to students; iv) Supporting remote self-learning through radio and television.

Sub-component 1.2: Supporting students with special needs: This sub-component was to finance: i) adapting self-study home packages into large print and braille for students with special needs; ii) providing recorded radio lessons and live presentations which were to be placed on memory cards for students with special needs; and iii) television- lessons with sign languages and sub-titles on screen for students with hearing difficulties.

Component 2: Supporting safe re-opening, student re-entry and capacity building for resilience (appraisal estimate US\$6.78 million, actual US\$6.87 million): This component was to finance two sub-components:

Sub-component 2.1: Supporting safe re-opening, student re-entry and sustained progression in schools: This sub-component was to finance two activities: i) conducting back-to-school awareness campaigns to encourage re-entry, enrollment and re-integration of students into the formal schooling system; and ii) providing school grants to support implementation of Water Sanitation and Hygiene (WASH) programs, provide psycho-social support, safety and security of students.

Sub-component 2.2: Supporting capacity building activities for resilience: This sub-component was to finance the following activities: i) conducting a rapid assessment on the effects of COVID-19 on primary and secondary education with focus on monitoring continued learning, school attendance and learning assessment and to address the social risk of school dropout; ii) establishing customized E-platform for tracking of learning through the Learner Management System of the Directorate of Education Standards (DES); iii) developing guidelines for re-opening of schools and the re-entry of students, training of Ministry of Education and Sports (MOES) officials and teachers on responding to emergencies and offering psycho-social support, and documentation of lessons learnt and experiences of education sector stakeholder's response to COVID-19; iv) strengthening the capacity of schools on preparedness, planning and responding on emergency situations including promoting psychosocial support and referrals for case management for teachers and learners; v) strengthening capacity of the education sector to improve coordination and communication among stakeholders such as ministries at all levels of education, teachers and school leaders and various community leaders; v) sensitizing communities by creating a strategy for



Risk Communication and Community Engagement (RCCE); and vi) supporting the roll out of radio programs and home-based learning for children of pre-primary age empowering parents to support interactive learning for their children at home.

Component 3: Project Management, Monitoring and Evaluation (appraisal estimate US\$0.35 million; actual US\$0.35 million): This component was to finance project implementation, supervision, monitoring and evaluation, procurement, financial management and auditing. More specifically, it was to finance project staff salary, equipment, transportation, data collection and analysis, and operating costs.

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

Project Cost: The project was estimated to cost US\$14.7 million, which was also the project's actual cost.

Financing: The project was financed by a grant in the amount of US\$14.7 million, which completely disbursed.

Borrower Contribution: The Borrower was not to make any financial contributions.

Dates: The project became effective on September 26, 2020 and closed on its original closing date of December 31, 2021. The project was never restructured.

3. Relevance of Objectives

Rationale

According to the PAD (p. 6) Uganda was one of the top regional performers in terms of economic growth and poverty reduction over the last two decades. At appraisal, Uganda had one of the youngest and most rapidly growing populations in the world, with a population of 41.9 million, an annual population growth rate of 3.3 percent and nearly half of the population under the age of 15. The school-aged population (six to 18 years) was growing at a very high rate, putting pressure on an already struggling education system. Recent public spending on education in Uganda, as a share of Gross Domestic Product (GDP), was one of the lowest in the region, decreasing from 15 to 10 percent over the last few years despite pioneering the Universal Secondary Education (USE) Policy in 2007 and against the minimum recommended levels of spending (at least 15 percent) specified in the agreement with the Global Partnership for Education (GPE). A large refugee inflow in recent years had exacerbated service delivery and access issues.

Before the Covid-19 pandemic, Uganda was already experiencing an education crisis. While gross primary enrollment rates (GER) remained at 110 percent in 2017, primary completion rates decreased from 64 percent in 2011 to 62 percent in 2016. Also, in 2017 GER for secondary education was only 28 percent due to high drop-out rates in primary and low transition rates from primary to lower secondary education which had declined from 72 percent in 2013 to 61 percent in 2017.

At the time of project appraisal, all schools were closed as part of the government's COVID-19 response. The pandemic and school closures were expected to have a wide range of impacts on students, teachers and households. Prolonged school closures were expected to lead to a loss in learning. Households were



to face increasing economic difficulties with rising unemployment and income losses. This could potentially impact the likelihood of children staying in school and transitioning to the next level of education once the schools reopen, increasing the number of out-of-school children. As a result, in April 2020, the government developed the Uganda Education Sector COVID-19 Response Plan and called for actions in several areas: i) minimize the adverse effects of COVID-19 on students, teachers and the education system at large; and ii) enhance the capacity of the MOES, District Local Governments (DLGs) and stakeholders to promote protection of students and teachers and ensure continuity of learning and transition to normal school program. The objective of this project supported the government's response plan.

Also, the objective of the project was in line with the Bank's Country Partnership Framework (FY16-21), especially with objective 3 "to strengthen human capital" as well as outcome 3.1 "improved access to and quality of primary and post-primary education". Furthermore, the project was in line with the recent Sector Country Diagnostics (2021), which identified the COVID-19 related school closure as a challenge.

Taking everything together, relevance of objectives was High.

Rating

High

4. Achievement of Objectives (Efficacy)

OBJECTIVE 1

Objective

To support students learning in pre-primary, primary and lower secondary during school closures associated with the COVID-19 pandemic

Rationale

Theory of Change: The project's theory of change envisioned that project outputs such as delivering self-study materials being distributed to pre-primary, primary and lower secondary students, launching TV and radio-based learning programs as well as adapting self-learning materials to large print and braille for students with special needs were to result in supporting students learning in pre-primary, primary and lower secondary during COVID-19 associated school closure.

Outputs:

- 2,617,341, Primary 5-Primary 7 copies of home study learning materials were designed, printed and distributed, achieving the target of 2,617,341 learning materials.
- 2,813,504 S1-S4 home study materials (one booklet for humanities and one booklet for science subjects) were designed, printed and distributed, achieving the target of 2,813,504 materials.



- 10,000 awareness and health safeguarding messages were disseminated to students, teachers, parents and community members through various media (text messaging, TV, radio), achieving the target of 10,000 messages.
- Self-learning materials were adapted to large print and braille for students with special needs, achieving the target of doing so.
- The project supported the National Curriculum Development Center (NCDC) in the development of a curriculum, contents, and teaching guides for home-study materials for pre-primary, primary, and secondary education levels.
- Sixteen selected radio stations were engaged from various sub-regions in the country to air home based learning lessons between June and September 2021.
- Procured assorted equipment for learners with Visual and Hearing Impairment including 77 victor readers, 154 SD cards, 100 MP players, 37 Braille Embossers, 137 Sign language manuals, and 90 rolls of braille paper.

Outcomes:

- 14,073,880 students benefited from direct interventions to enhance learning, achieving the target of 14,000,000 students. Of these students, 7,036,940 students were female, achieving the target of 7,000,000 students.
- 12,629,565 children were supported with distance/home-based learning interventions, exceeding the target of 11,900,000 children.

The intended outcomes that were measured were output-oriented, and this was understandable in the context of what could realistically be measured in a short-term emergency operation. Although the project played a leading role in the education response to the pandemic, there were co-existing interventions implemented by other Development Partners typically focused on specific geographical areas. All things considered, this objective is assessed as almost fully achieved.

Rating

Substantial

OBJECTIVE 2

Objective

To ensure a safe reopening and student reentry

Rationale

Theory of Change: The project's theory of change envisioned that project outputs such as equipping grant-supported schools with minimum hygiene standards for the prevention of COVID-19, disseminating awareness and health safeguarding campaigns through various media, training headteachers on emergency response preparedness and psycho-social response, establishing guidelines for re-opening and an e-learning platform as well as conducting an assessment for students to evaluate loss of learning were to result in a safe reopening and student reentry.



The project assumed that schools were to re-open during the project's life-time. This ICR Review notes that the assumption was not fully realistic given the very short implementation period.

Outputs:

- 13,756 schools were supported with grants to implement minimum hygiene standards for the prevention of COVID-19, achieving the target of 12,200 schools.
- The project supported the Uganda National Examination Board (UNEB) in conducting a rapid assessment to determine the effects of COVID-19 and loss of learning at primary and secondary education levels. In March 2021, UNEB conducted a national assessment with a sample of 700 schools (500 primary and 200 secondary schools) selected from 100 districts. The findings of these assessment informed the MOES' strategy for support after widespread schools re-opening in January 2022.
- 2,606,817 students' learning was assessed to evaluate loss of learning during school closure, not achieving the target of 3,181,039 students.
- 159,247 officials and teachers in grant-supported schools returned to school once the school system was re-opened. Achieving the target of 151,858 officials and teachers.
- 14,353 headteachers were trained in emergency response preparedness and psycho-social support, achieving the target of 12,200 headteachers.
- 63 percent of students were provided with access to programs on psycho-social support, achieving the target of 60 percent.
- All 135 local governments were monitored to ensure compliance with the Standard Operating Procedures (SOP) for re-opening of education institutions as communicated by the government.
- An e-learning platform for tracking of learning was procured and developed.

Outcomes:

The ICR reported that 6,362,078 children (who were previously enrolled in grant-supported schools) returned to school once the school system was reopened, achieving the target of 5,986,540 children. But this was not the original target of 10.2 million children (PAD, p. 28). The outcome target was reduced without formal revision in consideration of partial school re-opening for selected grades. According to the ICR (p. 17), only Grades Primary 4-7 and Secondary 1-6 returned to school during the partial opening, aggregating at 6,362,078 children. A corresponding reduced denominator of 7,042,989 children was used by the ICR and it showed that 90 percent of children in those grades (who were previously enrolled in grant-supported schools) returned to school.

In this context, the objective is assessed as almost fully achieved.

Rating
Substantial



OVERALL EFFICACY

Rationale

The project almost fully achieved its two objectives to support students learning pre-primary, primary and lower secondary during school closures associated with the COVID-19 pandemic and to ensure a safe reopening and student reentry. However, according to the ICR (p. 18) while this project was implemented, development partners supported the implementation of other projects as well. Although the project had an important contributing role, it is not clear to what extent the reported achievements can only be attributed to this project.

Overall Efficacy Rating

Substantial

5. Efficiency

Economic efficiency:

The PAD (p. 18) conducted cost-benefit analysis. Costs were set as the total costs of the project (US\$14.7 million). Benefits were identified as a decrease in school drop-outs and learning losses due to home-based learning interventions. The analysis assumed different scenarios: i) scenario 1: 10 percent of primary and secondary students drop out; ii) scenario 2: 20 percent of primary and secondary students drop out; iii) scenario 3: 30 percent of primary and secondary students drop out. Using a discount rate of 8 percent, the analysis estimated a Net Present Values (NPVs) ranging from US\$26 million to US\$114 million and internal rates of returns (IRR) between 9 and 9.6 percent, indicating that the project was a worthwhile investment.

The ICR (p. 19) conducted a cost-benefit analysis using actual costs and results. The benefits were related to the lower share of students in primary and lower secondary education dropping out and from reducing learning losses resulting from home-based learning interventions. The analysis calculated a NPV of US\$523 million and an IRR of 13 percent.

According to the Bank team (October 7, 2022) the significant differences in the NPV and IRR (at appraisal and closure) were a result of: i) discount rate used (which dropped from 8 percent to 6.5 percent); ii) uncertainty about the length of school closures and how much these would impact current students resulted in the design of possible scenarios at appraisal, with different numbers used in the analyses. The closest scenario to the actual numbers was the third scenario. When the project closed, schools had been closed for 21 months and the economic analysis at closure took into account the benefits resulting from avoided dropouts over this period.

Operational efficiency:

According to the ICR (p. 20) the project experienced significant efficiency gains due to cost savings across several sub-components, resulting in a larger than planned number of beneficiaries benefitting from project interventions. According to the Bank team (October 7, 2022) these gains were a result of: i) favorable US Dollar to Ugandan shilling exchange rate; ii) saving on the procurement of radio lessons; and iii) change of bidding method from Direct Selection Method of single supplier that was a State-Owned Enterprise (SOE), to competitive bidding using three companies, spread strategically across three regions in the country, thus



allowing for savings in transportation and distribution costs. The competitive process also resulted in a lower unit rate and thus the number of home study materials increased from 3,750,369 to 5,430,529.

At the same time, several aspects of implementation moderately reduced efficiency. The project experienced delays with the printing and distribution of home study materials as a result of internal processing delays at the MoES, disruptions caused by the general presidential and parliamentary elections, strict COVID-19 curfew, limited schools officials presented at school premises, adverse weather conditions, and restricted access to schools during school exams in March 2021. Allocations for printing and distribution of home study materials were not sufficient to cover all P1-P7 and S1-S6 students. Candidate and pre-candidate classes (P5-P7) and S1-S4 were prioritized, and as a consequence, alternative sources of funding had to be sought to fund the lower primary (P1-P4) and upper secondary (S5-S6) levels (ICR, p. 23).

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 | ✓ | 9.60 | 100.00 <input type="checkbox"/> Not Applicable |
| ICR Estimate | ✓ | 13.00 | 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 rated High given full alignment with Bank’s Country Partnership Framework (FY16-21), especially with CPF objective 3 “to strengthen human capital”. Efficacy was rated Substantial, as project objectives were almost fully achieved. Efficiency was rated Substantial because some aspects of implementation moderately reduced efficiency. Taking everything together, the project’s outcome rating is Satisfactory.

a. **Outcome Rating**
Satisfactory

7. Risk to Development Outcome

Key risks to development outcome can be classified into the following categories:



- **Financial:** Uganda's increasing fiscal pressure, with a fall in GDP growth related to the COVID-10 pandemic, and the lack of a continued counterpart budget, will likely negatively impact project outcomes. For example, the low value of capitation grants to schools (especially at the primary level), will likely be insufficient to cover additional required Water, Sanitation and Hygiene (WASH) equipment to comply with the SOPs to ensure that schools remain open.
- **Macroeconomic:** The financial pressure of the COVID-19 pandemic will likely continue to affect the education system and result in students dropping-out from school due to loss of household income, rising school fees, and other socio-economic issues. The government continues to show its commitment by conducting "Back to School" campaigns and working with the Bank on the Uganda Secondary Education Expansion Project (USEEP) (financing amount US\$150 million) which aims to enhance access to lower secondary education by focusing on underserved populations in targeted areas and builds on outcomes of this project.

8. Assessment of Bank Performance

a. Quality-at-Entry

The project's design was built on frameworks and implementation arrangements established for the GPE-supported Teacher and School Effectiveness Project (closed in 2019). The design also reflected lessons learned such as the benefits of using educational radio and television as well as sustaining a remote learning model.

The Bank team identified relevant risks including adverse effects on the macroeconomic and fiscal situation stemming from COVID-19 and resulting fiscal constraints that could have adverse effects on education service delivery. Also, social risks were identified related to limited stakeholder consultations prior to project preparation due to COVID-19, exposure of project workers to the communities leading to Sexual Exploitation and Abuse (SEA) / Sexual Harassment (SH) and competition for resources that could exacerbate Gender Based Violence (GBV) and Violence Against Children (VAC), and exclusion of Vulnerable and Marginalized Groups (VMGs) that may be present in the project area. The Bank team mitigated these risks by strengthening capacity in public education, operationalizing a Grievance Redress Mechanism, as well as the MOES preparing a labor management plan and establishing a worker specific grievance mechanism. Finally, the MOES was to conduct Social Assessment and prepare a VMG Plan. The project design experienced minor shortcomings. According to the ICR (p. 23) the project design only included public schools and excluded non-state schools, which provided education to 32 percent of students at primary and 62 percent of students at secondary levels. These non-state schools did not receive tuition fees during the protracted closures and as a result prevented them from purchasing the necessary equipment to comply with the new health and safety standards procedures required by the government.

Furthermore, even though approximately half of the project funding was allocated to printing and distributing of home study materials, the relatively high cost of printing and distributing did not allow for all students to be covered under the project. Therefore, it was necessary to find a different source of financing for lower primary and upper secondary students, which resulted in delivery delays for these students.



The project's Results Framework was adequate (see section 9a for more details).

Taking everything together, and given the emergency nature of the project, the quality of entry rating is Satisfactory.

Quality-at-Entry Rating

Satisfactory

b. Quality of supervision

The Bank team consisted of team members with the appropriate skills for the implementation of this project. In total, the Bank team conducted four virtual implementation support missions and provided regular support allowing for a smooth implementation and early identification of implementation bottlenecks. Also, the short implementation period benefitted from the continuity of having the same Task Team Leader (TTL) from project design to closure. According to the ICR (p. 29) the Bank team collaborated closely with different development partners including, UNICEF, FCDO, and USAID.

When the project experienced procurement related issues at the beginning of project implementation, the Bank team addressed them by the procurement specialist proactively working with the MOES to explain the Bank project regulations and guidelines and providing training for the project procurement officer.

Quality of Supervision Rating

Satisfactory

Overall Bank Performance Rating

Satisfactory

9. M&E Design, Implementation, & Utilization

a. M&E Design

The project's objectives were sufficiently specified, although the use of the word support raised some ambiguity. The project's theory of change and how key activities and outputs were to lead to the intended outcomes were adequately reflected in the Results Framework. The selected indicators encompassed intended outcomes that were clearly defined and measurable.

According to the PAD (p. 18), MOES was to be responsible for the project's M&E activities. Data was to be collected from the Directorate of Education Standards (DES), National Assessment of Progress of Education (NAPE), Uganda National Examination Board (UNEBC) as well as audit statements related to school grant releases and expenditures.



b. M&E Implementation

According to the ICR (p. 26) data on project indicators were collected and reported on a regular basis in the four Implementation Status Reports (ISRs) and Aide-Memoires. The Project Coordinator ensured strong monitoring of project interventions. Furthermore, the ICR (p. 26) stated that data collected by the Directorate of Education (DES) provided up-to-date information on the extent the schools were implementing the SOPs and psycho-social support training prior to the reopening of schools.

However, due to the protracted school closures during the COVID-19 pandemic, data could not be collected to the extent originally planned. For example, data on all students on Project Development Indicator (PDI) 3 “number of children previously enrolled in grant-supported schools who return to school once the school system is reopened” and Intermediate Results Indicator (IOI7) “number of students whose learning was assessed to evaluate loss of learning during school closure” could not be collected.

c. M&E Utilization

The ICR (p. 26) stated that the project’s M&E was used to inform decision making. For example, during the first implementation support mission, the team identified slow implementation progress resulting in the Bank to advise MOES to change the procurement mode to fast-track. Also, data collected by the DES allowed DLGs and COVID-19 District Taskforces to provide follow up support to districts and schools that did not comply with SOPs standards.

M&E Quality Rating

Substantial

10. Other Issues

a. Safeguards

According to the ICR (p. 28), an Environmental and Social Review Summary and Environmental and Social Commitment Plan was prepared and disclosed. Also, a Stakeholder Engagement Plan was prepared by the MOES in consultation with stakeholders and beneficiaries. Additional required safeguard instruments included Labor Management Plan, Infection Prevention and Control and Waste Management Plan, Communication Strategy, Gender Based Violence Action Plan, Vulnerable and Marginalized Groups Plan and a final Stakeholder Engagement Plan. The project experienced delays in the finalization of the draft environmental and social risks management instruments which resulted in a Moderately Satisfactory rating until the MTR. By October 2021, all safeguard instruments were finalized resulting in a rating upgrade to Satisfactory.

Finally, the ICR (p. 28) stated that the project disseminated the Environmental and Social related policies, guidelines, and materials to over 328 districts and school level staff successfully.



b. Fiduciary Compliance

Financial Management:

According to the ICR (p. 28), existing Public Financial Management (PFM) structures were used for the project’s financial management (FM). The project’s recording and reporting of project transactions were considered adequate throughout implementation. Project staff consisted of an accountant and assistant, visited all DLGs. Over 90 percent had successfully submitted accountability reports to respective district governments. However, the ICR (p. 28) stated that since the FM staff was not being paid through project funds, they had limited time available for project activities, affecting implementation speed. The project’s FM was rated Satisfactory in the last Implementation Status Report (ISR).

According to the Bank team (October 7, 2022) the external auditor’s opinion was unqualified and on time.

Procurement:

According to the ICR (p. 28), initially, the project encountered procurement related issues. These issues included: i) cancellation of printing equipment for NCDC since funds had already been allocated by MOES; ii) initial delays in the procurement of printing and distribution of learning materials; and iii) delays in the procurement of TV and radio programs related to the Uganda Communication Commission’s (UCC) and delay in providing a list of stations with the widest coverage.

According to the ICR (p. 28) the project’s overall procurement performance in regard to processing steps, internal controls, record keeping, and implementation was adequate. In the last ISR, the project’s procurement rating was Highly Satisfactory.

c. Unintended impacts (Positive or Negative)

NA

d. Other

11. Ratings

| Ratings | ICR | IEG | Reason for Disagreements/Comment |
|---------|---------------------|--------------|--|
| Outcome | Highly Satisfactory | Satisfactory | The outcome for safe reopening and student reentry could not be fully measured; and, although the project was a main contributor to intended outcomes, attribution extended to other stakeholders. |



| | | | |
|------------------|---------------------|--------------|--|
| Bank Performance | Highly Satisfactory | Satisfactory | There were minor shortcomings in the Quality-at-Entry consisting of design issues highlighted by the ICR; and there was insufficient consideration of costs of printing and distribution of home study materials and their impact. |
| Quality of M&E | Substantial | Substantial | |
| Quality of ICR | --- | Substantial | |

12. Lessons

The ICR (p. 30-32) included several lessons learned which were adapted by IEG:

- **Targeting poor and vulnerable students when designing remote learning interventions might mitigate learning losses to those who are likely to incur greater learning losses. Also, interventions for addressing barriers, developing tools to monitor re-enrollment, and setting up structures to bring vulnerable students back are key parts of the project design.** This project did not specifically target poor and vulnerable students resulting in far worse numeracy proficiency outcomes for girls and students in rural areas.
- **Some remote learning interventions such as radio broadcasting and home study materials can be scaled up and adapted as supplementary learning materials when schools re-open.** In this project, radio broadcasting and home study materials were the most popular remote learning interventions, making it a useful tool for a remedial education program.
- **Providing students with continuous psychosocial support services can improve children’s learning.** In this project, the demand for psychological support was high among students and teachers affected by the COVID-19 pandemic. Since there is a growing body of evidence demonstrating that psycho-social services create conditions for improved learning for children and youth affected by crisis, the GoU and any future WB operation could build upon the structures established by this project to continue providing psychosocial support services.

13. Assessment Recommended?

No

14. Comments on Quality of ICR

The ICR provided an adequate overview of project preparation and implementation. Also, the ICR was internally consistent and concise. Given the short duration of the project (15 months) the ICR provided



intermediate outcomes rather than outcomes. Furthermore, the ICR included a traditional Economic analysis. The ICR did not sufficiently state how the Bank addressed different implementation bottlenecks such as procurement. Taking everything together, the quality of the ICR is rated Substantial.

a. Quality of ICR Rating
Substantial