## BASIC INFORMATION

### A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Project ID</th>
<th>Project Name</th>
<th>Parent Project ID (if any)</th>
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<tbody>
<tr>
<td>Cambodia</td>
<td>P172630</td>
<td>Engaging Citizens to Improve Service Delivery Through Social Accountability</td>
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</table>

<table>
<thead>
<tr>
<th>Region</th>
<th>Estimated Appraisal Date</th>
<th>Estimated Board Date</th>
<th>Practice Area (Lead)</th>
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<tbody>
<tr>
<td>EAST ASIA AND PACIFIC</td>
<td>20-Jan-2020</td>
<td>28-Feb-2020</td>
<td>Social</td>
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<table>
<thead>
<tr>
<th>Financing Instrument</th>
<th>Borrower(s)</th>
<th>Implementing Agency</th>
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<tbody>
<tr>
<td>Investment Project Financing</td>
<td>World Vision International</td>
<td>World Vision International</td>
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### Proposed Development Objective(s)

To improve the quality and responsiveness of selected public services through more informed and engaged citizens.

### Components


## PROJECT FINANCING DATA (US$, Millions)

### SUMMARY

<table>
<thead>
<tr>
<th>Total Project Cost</th>
<th>6.75</th>
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<tr>
<td>Total Financing</td>
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<tr>
<td>of which IBRD/IDA</td>
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<tr>
<td>Financing Gap</td>
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### DETAILS

**Non-World Bank Group Financing**

<table>
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<tr>
<th>Counterpart Funding</th>
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<tbody>
<tr>
<td>Non-Government Organization (NGO) of Borrowing Country</td>
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</tr>
</tbody>
</table>
The review did authorize the team to appraise and negotiate

Other Decision (as needed)

B. Introduction and Context

Country Context

1. Over the past two decades, economic growth in Cambodia has been impressive and remained robust. The economy experienced and annual average growth rate of 7.9 percent over 1997-2017, ranking among the top seven fastest growing economies in the world. Growth was largely driven by exports of goods and services, which grew 14.6 percent a year over the same period. As a result, Cambodia’s per capita Gross National Income (GNI) increased almost fourfold, from $320 in 1997 to US$1230 in 2017. Growth remained strong in 2018, achieving a four year high of 7.5 percent.

2. Continuous high growth has led to dramatically reduced monetary poverty. As a result of Cambodia’s sustained high growth, GNI per capita more than quadrupled from USD 250 in 1995 to USD 1,230 in 2017. Official estimates show that the percentage of Cambodians living under the national poverty line fell from 47.8 percent in 2007 to 13.5 percent in 2014 (see Figure 3). Poverty estimates for 2015 – 2017 are currently under review by the Government¹, but preliminary indications are that poverty continued to decline.

3. Poverty reduction has been accompanied by improved human development and significant increases in living standards. Cambodia has experienced one of the fastest improvements in human development indicators in the region: life expectancy increased from 58 years (2000) to 69 (2017); under five mortality rate decreased from 107 per 1000 live births (2000) to 29 (2017); primary school completion rate increased from 51 percent in 2000 to 90 percent in 2017; and child stunting declined from 59 percent (1996) to 32 percent (2014). Indicators of living standards such as asset ownership and housing amenities have also improved. Between 2007 and 2017, ownership of cell phones increased by 65 percentage points, motorcycles by 42 percentage points, and access to

¹ The joint review of poverty estimates between 2009 and 2017 shows a robust trend in poverty reduction The World Bank is collaborating with the National Working Group of Poverty Measurement led by Ministry of Planning and the National Institute of Statistics to review and update the poverty estimation methodology. The identified gaps in consumption measurement have been incorporated in the CSES 2019 to improve poverty measurement going forward.
electricity by 55 percentage points.

4. Despite these gains, vulnerability remains high. Most households that escaped poverty did so by only a small margin, leaving them highly vulnerable to falling back into poverty and preventing more sustained social mobility. Small income shocks, reducing consumption, could have a significant impact on poverty.\(^2\) This underscores the fragility of progress made in fighting poverty. The 2018 World Risk Index ranks Cambodia as the 12\(^{th}\) most disaster-prone country in its index of 172 countries.\(^3\) Frequent disasters are a major source of catastrophic spending, pushing non-poor households into poverty and making it more challenging for poor households to eventually escape poverty. For instance, based on a 2013 post-flood needs assessment, average monthly incomes of those affected dropped more than 25 percent, enough to push many into poverty.\(^4\) Likewise, 3.1 percent of the population had to incur debt to pay for health expenditures.

5. Enhancing public sector capabilities to deliver public services effectively and accountably will be critical to meeting the evolving needs of citizens and the private sector. Governance remains an issue in Cambodia, which scores considerably lower than other ASEAN countries according to the World Governance Indicators (see Figure 6). In some areas, such as control of corruption and voice and accountability, little to no progress was made between 2005 and 2014. While some progress has been made, bribery incidence (affecting 63 percent of reporting firms in 2016)\(^5\) remains by far the highest among peer countries suggesting that governance issues have a negative impact on both public sector services as well as the growing private sector. The capacity of public institutions continues to be weak impacting the key regulatory functions, civil service and the efficiency of public resource management. Nascent decentralization reforms will require concerted measures to better equip sub-national administration with the capacity and resources to deliver quality local services. Efforts to reinforce accountability at the level of service provision will need to continue. Promoting two-way interaction between beneficiaries and government, including by using mobile technology, can enhance citizen engagement and improve service delivery.

**Sectoral and Institutional Context**

6. To strengthen access to, and the quality of public services, and to enable government to be more responsive to the needs of citizens, the Royal Government of Cambodia (RGC) began subnational governance reforms back in 2001 with passage of the Law on Management of Commune and Sangkat Administration, followed by passage of the Law on Management of Capital, Province, Municipality, Khan Administration in 2008. A National Program for Sub-National Democratic Development (SNDD) 2010–2019, was subsequently created with the intention to establish a “vibrant, democratically-elected and locally accountable sub-national governance system,” supported by local budgets to empower local government councils and effective citizen engagement in local decision-making. The SNDD was broken down into three, three-year implementation plans, each with specific activities, outcomes and annual budgets. RGC is currently in the last of its 3-year implementation plans (IP3-3), and the period of implementation has been extended to 2020.

7. The SNDD reform agenda has seen significant progress in many areas including: the direct election of

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\(^2\) In 2014, it was estimated that a negative small shock of US$ 0.5 per day would cause the national poverty rate to increase to 40 percent, or approximately six million people.

\(^3\) World Risk Report 2018, Institute for International Law of Peace and Armed Conflict, 2018. 8


\(^5\) Cambodia: Systematic Country Diagnostic-Sustaining Strong Growth for the Benefit of All, WBG, 2017

commune/sangkat councils and indirect election of districts and provincial councils; the establishment of financial management, planning, administration, and council procedures; the directing of financing of local development priorities through a Commune/Sangkat Investment Fund and District/Municipality Fund; the creation of policies for functional transfer from national to subnational levels and permissive functions; and the transferring of primary education, solid waste management and other significant functions to districts/municipalities (DMs). However, many of the goals set out in the SNDD program have yet to be realized, in particular, the transfer of functions (and finances) from central line ministries to DM administration. The legitimacy and representativeness of local councils also suffered a major set-back in 2017, when the main opposition party, the Cambodia National Rescue Party (CNRP) was abolished. This led to the replacement of all recently elected CNRP commune council members with ruling Cambodia Peoples Party (CPP) members, creating a one-party local government system. The indirect elections of district and provincial councils by commune/sangkat council members in May 2019 inevitably concluded with all commune, district and provincial councils being filled with CPP representatives.

8. Despite the many setbacks and obstacles to progress in the SNDD reform agenda, one of the bright spots has been the successful implementation of the 3-year Implementation Plan for the Social Accountability Framework (ISAF), 2015-2018. The preparation and initiation of the ISAF followed endorsement of the Social Accountability Strategic Plan for Subnational Democratic Development by the RGC’s National Committee for Subnational Democratic Development (NCDD) in July 2013. This policy framework was developed through a consultative process involving government, over 80 NGOs, NGO networks and development partners. ISAF was added to the second 3-year SNDD implementation plan (IP3-2), and has since been included in IP3-3, with the overall aim of empowering citizens to hold government to account for local service delivery and resource allocation covering all primary schools, health centers and commune councils in 120 communes across the country.

9. During its first 3-year implementation period, the four ISAF operational components of: (1) access to information and open budgets, (2) citizen monitoring, (3) capacity building and facilitation and, (4) program management, learning and monitoring were designed, tested, and refined. Partnerships with and between supply-side (state) and demand-side (civil society) actors were established, and, ISAF activities were rolled out to 75% (18 out of 24) of provinces, 62% (98 out of 159) of districts, and 56% (827 out of 1410) of communes across the country.

10. ISAF is a unique and groundbreaking program in the Cambodian context, and the achievements over the first 3-year implementation period (referred to subsequently as, ISAF Phase I, or ISAF I) prompted all the involved stakeholders to call for a second phase of ISAF implementation, ISAF Phase II, or ISAF II. There is still much to be done to extend ISAF coverage, refine ISAF methodologies and ensure that achievements to date are consolidated and integrated into sustainable systems, behaviors and practices of sub-national service delivery and active citizenship. ISAF II will allow more time for the kinds of social and behavioral changes required for social accountability to be sustainable to take place.

11. In response to stakeholder demand, an ISAF Phase II Implementation Plan was prepared in late 2018 by the NCDDS with support from the World Bank, and in consultation with a range of government and civil society stakeholders, outlining the key dimensions of a new five-year phase of ISAF, from 2019 to 2023. The plan was produced based on an assessment of Phase I strengths, weaknesses, achievements, challenges, and lessons learned. Some key features of ISAF II will include:
• Expansion of ISAF coverage to all rural communes.
• Expansion of ISAF coverage to all urban areas (and adaptation of ISAF methodologies for urban settings).
• Extension of ISAF activities to district administrations (DAs) and other selected services (such as water supply, sanitation and potentially agricultural extension services, protected area management, solid waste management, and/or referral hospitals).
• Use of information and communication technologies (ICTs) such as mobile applications (apps) to involve a larger number of citizens in ISAF (I4C, citizen monitoring and JAAP) activities.
• Measures to enhance government responsiveness to citizen feedback, particularly to increase JAAP implementation (including possible use of performance-based financing to districts and/or communes, and/or “matching funds”).
• Institutionalization and enhanced sustainability of ISAF processes (including the establishment of a national CAF volunteer Community of Practice/Network).

12. The goal by the end of Phase II is to establish permanent systems, within government and civil society, to ensure that (both supply-side and demand-side) social accountability activities can be sustained in the long term. After five years, by 2023, it is expected that ISAF Phase II will conclude with both evidence of significant service delivery improvements and an implementation approach that requires minimal external financial support. The proposed project is intended to contribute to the objectives of ISAF II, but government as well as other Development Partners and NGOs are also expected to contribute

C. Proposed Development Objective(s)

Development Objective(s) (From PAD)

To improve the quality and responsiveness of selected public services through more informed and engaged citizens.

Key Results

• Percentage of target primary schools, health centers and communes/sangkats demonstrating improved performance and meeting national standards (according to I4C data).
• Percentage of JAAP actions (to improve primary school, health center and commune/sangkat services) that are completed or ongoing.
• Percentage of target communes/sangkats that have completed at least three full annual ISAF cycles.
• Percentage of graduated target communes/sangkats where a Community Accountability Facilitator (CAF) network has been created and is operational.

D. Project Description

13. This project is proposed as support for the “demand-side” of social accountability, enabling civil society actors to organize and “demand” better public services. It will be complemented by another proposed project which would enable the NCDDS to implement the “supply-side” of social accountability by providing the information that citizens need to hold public service providers accountable and by building the will and capacity of government officials to respond to feedback and demands from citizens. As such, the two projects should be
viewed side-by-side as two parts of a whole, financed separately so that the implementing agencies on each side can act freely to balance each other out and to collaborate and partner on their own terms to achieve their collective aims of citizens that are more engaged in the delivery of public services and improvements in the quality of services for the people of Cambodia.

14. There are three main components of this project which comprise the annual cycle of social accountability activities: (1) Transparency and access to information; (2) Citizen monitoring; and (3) Implementation of Joint Accountability Action Plans (JAAPs). Component (4) Training and capacity development, and (5) Civil society coordination and partnership support, provide overarching support to building the capacity required to implement the planned activities and sustain them beyond the duration of this project.

15. Overall there will be three levels of intervention at the district/municipality (DM) and commune/sangkat (CS) level. The intensity of effort in each locality will vary depending upon whether ISAF has been previously implemented in that DM or CS. This differentiated approach is aimed at reducing external support over time as a way of “graduating” DMs from ISAF external support and integrating social accountability activities into core government systems and civil society action. DMs/CSs that have had no previous experience with ISAF with receive the most support as they will need to start from the basic concepts and processes of ISAF. DMs/CSs with ISAF experience will not need to receive support on the basics of ISAF, and many of them may also have experienced local NGOs and trained CAFs to draw on, but they will still need support to prepare them to graduate from external project assistance. Finally, a third package of support will significantly reduce the intensity of the intervention and aim at leaving behind subnational government, service providers and civil society actors (especially CAFs) that continue to carry out social accountability activities after project support has receded.

16. World Vision International (WVI) will be the main implementing agency for the proposed project, ensuring overall coordination and working through partnerships with other local (and potentially other international) NGOs as well as individual community accountability facilitators working at the commune and villages levels. WV will focus most of its resources in new DMs as well as the DMs where ISAF was previously active, but which have failed to sustain activities after ISAF I. The latter DMs will need to be “reactivated” by reengaging the local NGOs and CAFs if they are available. DMs where WV continues to provide support for CAF networks, and those who eventually have at least 2 years of ISAF experience, will receive a reduced amount of support with the focus on establishing sustainable CAF networks and subnational authorities committed to working with CAFs and interested citizens to continue social accountability activities.

17. In terms of service coverage, this project and the complementary supply-side project in particular, will continue to focus on the basic services covered in ISAF I: commune councils, health centers and primary schools. In addition, a new instrument and methodology for holding District and Municipality Administrations accountable for quality service delivery will be developed, piloted and scaled up over the duration of this project. This represents a fourth type of service provider that will be covered in ISAF. In addition, this project will also enable World Vision to contribute to discussions with additional line ministries to help them to eventually develop, pilot and implement ISAF activities for other services such as water supply, wastewater management, nutrition-related public services, agricultural extension and protected area/natural resource management.

18. The total project financing amount is US$ 6.75 million, with US$ 5.95 million from Social Accountability and Service Delivery Multi Donor Trust Fund (SASD-TF) and US$ 0.80 million from WVI. Below are summary descriptions of each project component.
Component 1: Transparency and Access to Information (US$1.50 million)

19. This component aims to strengthen transparency and citizen access to, and demand for, public service performance information, budget and expenditure data. The goals are to: (i) strengthen the supply and dissemination of relevant public service information (including financial information), (ii) make the information more accessible to the public, and (iii) strengthen the capacity of citizens to understand the information provided so that they may more actively and effectively participate in dialogue on service provider performance and use of funds.

20. Once government agencies make service provider information publicly available through standardized Information for Citizen (I4C) posters and through newly developed multimedia and electronic platforms, volunteer Community Accountability Facilitators (CAFs) will help to communicate this information to citizens. The CAFs will make use of small village meetings, local radio, printed calendars and other materials, awareness raising on the use of the ISAF mobile application (App) and other means. Videos will also be developed and deployed via Facebook, the ISAF mobile App and other platforms, illustrating what quality public service is meant to look like as another means of educating the public. Video, radio and the engagement of CAFs that speak local, indigenous languages will help to make information accessible to indigenous and other ethnic minority groups living in Cambodia.

21. An enhanced focus on understanding service provider budgets, expenditures and procurement activity will be developed, including training in budget literacy for CAFs which can then be passed on to citizens. World Vision will also engage with NCDDS to finalize the systems for sharing information on District Administration services and add this to its I4C activities at the village and commune level. Educating citizens on additional public services (i.e. water supply and sanitation) at the village and commune level may be added as the relevant line ministries make such information available.

22. Sustainable mechanisms for financing I4C dissemination, including through CAFs, will be piloted and integrated into government and civil society support systems such as financing by Commune Councils, District Administrations (including through the District Ombudsman Office), and local civil society organizations (CSOs).

Component 2: Citizen Monitoring (US$1.69 million)

23. This component will empower citizens to monitor and assess public services and propose actions for improvement using an adapted Community Scorecard (CSC) methodology. Community Accountability Facilitators (CAFs), with the support of local NGO partners, as needed, will undertake the groundwork for the citizen monitoring process by identifying and mobilizing community participants and making logistical preparations for assessment meetings. CAFs will then help to prepare (in the case of citizen/community assessment meetings, and in districts organizing self-assessment meetings for the first time) and support separate assessment meetings with (i) the providers and (ii) the users of each service. Service provider (i.e. primary school, health center, commune and district administration) assessments are called “self-assessment” meetings. In both the service provider “self-assessment” and user assessment meetings, participants collectively generate and prioritize assessment criteria, score each criterion, describe strengths and weaknesses, and identify priority actions for improvement. Following these separate assessment meetings, users and providers for each service come together in an “interface meeting” to discuss the outcomes of their respective assessments and to collectively agree a set of priority actions for improvement – distinguishing between those actions that they can implement themselves with available resources and those that will require additional resources and/or action on the part of other (i.e. external or
higher-level) actors.

24. Through the proposed project, World Vision will train and support CAFs to organize and facilitate the CSC process, including service provider self-assessment, user assessment and interface meetings. Via the ISAF mobile App, CAFs will also enter the results of these assessment meetings into a central database so that the results can be seen publicly and by the relevant subnational government and line ministries so that they can take follow-up action, as needed, to improve service quality. The results of the Interface Meeting will also be used to prepare a Joint Accountability Action Plan (JAAP) in print form and electronically (via the ISAF mobile App) for each commune, including actions for each service provider. As participation in CSC meetings is limited due to space and resources, CAFs will promote the use of the mobile ISAF App as a way of extending information about the process and its outcomes to a broader set of citizens. This data will also be factored into JAAP prioritization process, when possible and be reviewed together with data generated from face-to-face meetings so that the full range of feedback provided is accessible to the public and service providers.

25. As in the case of the I4C activities described above, sustainable mechanisms for financing the annual CAF-supported the Community Process will be piloted - drawing on integrated government and civil society support systems. Through the complementary “supply-side” project mentioned earlier, NCDDS will train district ISAF trainers (one from each line ministry) to conduct self-assessment meetings. The NCDDS will also liaise with relevant line ministries and authorities to ensure that, by the end of ISAF II, the (minimal) direct costs of conducting these meetings on an annual basis are built into government budgets.

Component 3: Implementation of Joint Accountability Action Plans (US$0.50 million in total, US$0.19 million from SASD-TF and US$0.31 million from WVI)

26. This component aims at supporting communities, public service providers and subnational government officials to take collective action to implement agreed Joint Accountability Action Plans (JAAPs). In each target community, at the final interface meeting, a joint committee made up of local officials, service providers and community members is formed to support and monitor the implementation of the resulting JAAP. The JAAP Committee prepares a detailed implementation plan for each priority action, mobilizes the resources required, coordinates/supports the implementation of each action, monitors progress and reports publicly on results twice yearly. The Committee also ensures that the JAAP is presented at the annual District Integration Workshop and that JAAP actions are incorporated into Commune Investment Plans, health center and school improvement plans, as appropriate.

27. While the primary responsibility for JAAP follow-up is through the JAAP Committee, chaired by the Commune Chief, CAFs are also members of the JAAP Committee and often play an active role in helping to organize and facilitate JAAP Committee meetings. CAFs will also enter JAAP action updates, or support Commune Chiefs or Clerks to update JAAP actions in the ISAF online database, as needed. World Vision will also aggregate JAAP actions at a line ministry level, identify areas where district, provincial or national level action and investment is needed and advocate for such action (i.e. provision of additional teachers, books, medicine, health center or school rooms, etc.) as needed.

28. For districts which are implementing ISAF for the first time, CAFs will be supported to engage more actively in JAAP Committee meetings, but this support will be reduced over the course of three years to the point where communes self-finance all aspects of the meetings.
Component 4: Capacity Development (US$1.80 million in total, US$1.73 million from SASD-TF and US$0.07 million from WVI)

29. This Component will support the review and revision of the ISAF Demand-side Manual and Training Guidelines, associated forms and documents, incorporating lessons from ISAF Phase I. It will also support the development of new demand-side guidelines for district administration services, and possibly additional services to be identified during implementation. Once such documents are finalized, they will be printed and disseminated electronically, as needed.

30. For CAFs that are just recruited, World Vision will conduct a modular training leading to a national-level certification based on certification processes applied by NGOs under ISAF Phase I. Certification includes both theoretical and practical classroom activity as well as demonstrated capacity to implement all ISAF CAF-led activities such as I4C and CSCs. Refresher training will also be provided each year. Under the proposed project, a specialized capacity building NGO will be financed through a sub-grant/sub-project to develop and support long-term capacity building and, potentially, to engage the relevant Ministry for professional certification (i.e. Ministry of Labor and Vocational Training) to specify the skills and competencies needed to certify them. A status of “CAF Leader” will also be developed to act as peer trainers/mentors/supervisors for other CAFs.

31. The capacity building NGO will also be tasked with developing a CAF Community of Practice that will promote and support ongoing (face-to-face and online) information sharing, communication and collaboration between CAFs at district level, provincial and national level. One of the roles of the capacity building NGO will be to develop safeguards to ensure the political independence of CAFs, “CAF Leaders” and Community of Practice. As an incentive for sustainability, one criterion for the selection of the capacity building NGO will be their willingness to continue to support the CAF network and certification process after the conclusion of project financing. The capacity building NGO will also coordinate with the government’s ISAF training activities to ensure that the content is consistent and potentially support certification of government staff in social accountability practices.

Component 5: Civil Society Coordination and Support (US$1.26 million in total, US$0.84 million from SASD-TF and US$0.42 million from WVI)

32. As World Vision will ensure the implementation of project activities both through its own subnational offices (where present) and through partnerships/sub-projects with other NGOs, the project will support the required administrative coordination costs. This will include subnational support staff who will play a role in liaising with “supply-side” counterparts, in particular ISAF focal points and working groups at the provincial and district levels. World Vision will also ensure coordinated civil society input into the joint (i.e. government and civil society) national-level Partnership Steering Committee (PSC) by organizing meetings of interested CSOs/NGOs and coordinating and communicating common messages. This component will also include the recruitment and management of CAFs and CAF leaders, as well as other project consultants, incremental NGO staff time (i.e. financial management, procurement and communications support) and sub-project agreements. Monitoring, evaluation, results and lessons learned documentation and dissemination will also be supported through various media. A mid-term and final evaluation will be required, and some funds will also be made available for learning events and small studies on selected topics. Incremental operating costs will also be covered.
Legal Operational Policies

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Projects on International Waterways OP 7.50  No

Projects in Disputed Areas OP 7.60  No

Summary of Assessment of Environmental and Social Risks and Impacts

E. Implementation

Institutional and Implementation Arrangements

33. World Vision will be the main implementing agency for this project. It will be responsible for the management, coordination and implementation of the project in the specified provinces/districts, including procurement, disbursement, and financial management. WV will also sign sub-grant agreements with local NGOs to complement its own organizational capacity and district/area field offices to extend its reach for the implementation of localized activities, within a group of provinces or districts. These local NGOs will primarily help to recruit, train and support CAFs in their work. Once they have been sufficiently trained, CAFs are the main implementers of ISAF activities on the ground. They conduct I4C outreach to communities, organize and facilitate CSCs, organize and facilitate interface meetings and JAAP preparation and support JAAP Committees to do follow-up.

34. As explained previously, World Vision, as the main implementing agency for demand-side ISAF activities, will work closely with NCDDS, the lead agency on the supply-side. This will include an MOU to be signed between the two organizations to commit themselves to the same coverage area as well as regular information sharing, meetings and interactions to allow for the smooth and coordinated implementation of supply and demand-side social accountability activities. In addition, a multi-stakeholder Partnership Steering Committee (PSC) which is comprised of half government and half civil society members, has been operational for the last three years and will continue to be a forum for dialogue and coordination between government and civil society on ISAF implementation.

35. At the provincial and district levels, World Vision and its local NGO partners will coordinate closely with provincial and district ISAF Working Groups and Focal Points, formed and assigned by provincial and district administrations with the support and guidance of NCDDS. World Vision will also work closely with nascent, district-level Ombudsman offices, as these units are responsible for receiving and responding to citizen complaints and feedback about public service delivery. As they are relatively new, the extent to which they can play a role in social accountability will be explored over the duration of the project. Communes Councils will also continue to play a key role as the Chair of the JAAP Committee and the primary subnational authority responsible for ensuring quality
service delivery for their constituents.

### CONTACT POINT

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### APPROVAL

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**Approved By**

Environmental and Social Standards Advisor: