

**PROJECT INFORMATION DOCUMENT (PID)
APPRAISAL STAGE**

Report No.: PIDA946

Project Name	Bangladesh Safety Net Systems for the Poorest Project (P132634)
Region	SOUTH ASIA
Country	Bangladesh
Sector(s)	Other social services (100%)
Theme(s)	Other accountability/anti-corruption (15%), Social safety nets (70%), Vulnerability assessment and monitoring (15%)
Lending Instrument	Specific Investment Loan
Project ID	P132634
Borrower(s)	Economic Relations Division, Ministry of Finance
Implementing Agency	Department of Disaster Management, Bangladesh Bureau of Statistics
Environmental Category	B-Partial Assessment
Date PID Prepared/Updated	10-Apr-2013
Date PID Approved/Disclosed	10-Apr-2013
Estimated Date of Appraisal Completion	18-Apr-2013
Estimated Date of Board Approval	20-Jun-2013
Decision	The Decision Meeting noted that the project meets the readiness filters for appraisal stage and authorized to upgrade the pre-appraisal stage into appraisal, and requested the project team to submit the negotiations package.

I. Project Context

Country Context

1. Despite remarkable progress in poverty reduction, extreme poverty in Bangladesh remains high. Over the last decade, Bangladesh has experienced resilient GDP growth, averaging a rate of 6 percent per year. Poverty rates have also demonstrated an impressive steady improvement during this period with an average decline of 1.75 percentage points per year. An average decline of this rate out-performs a good number of other countries. Poverty fell from 48.9 percent in 2000 to 40 percent in 2005 and to 31.5 percent in 2010. Coupled with this substantial decrease in the poverty rate Bangladesh made steady progress in human development as characterized by better nutrition outcomes, increased literacy, and improved access to supply water and living conditions. While this overall consistent improvement in wellbeing is encouraging, poverty continues to be a substantial and stubborn problem with around 26 million people still living in extreme poverty in a country with a population size of 148 million.

2. Large numbers of people are vulnerable to shocks. A changing climate has introduced new sources of vulnerability faced by Bangladesh's poor population. Economic impacts of shocks resulting from climate change could reverse the recent gains in the areas of economic growth and poverty reduction. The impact of shocks on poverty is of particular concern for Bangladesh given the large size of vulnerable population living around the poverty line: in 2010 52 million non poor people consumed less than 1.5 times the value of the poverty line. Thus a small shock can have a large impact on the poverty rate.

3. Poor households living in the poorest regions are less likely to cope with shocks. A nationally representative survey conducted in 2009 show that households still rely on coping mechanisms that are likely to have negative welfare consequences or that are very costly. Rural households are particularly vulnerable. While urban households rely more on savings, rural households, for example, are more likely to dip into their assets or use high interest loans from money lenders compared to their urban counterparts. When faced with climate shocks, an overwhelming majority of households report to be less able to cope. This is consistent with the notion that when faced with climatic or covariate shocks, households are unable to rely on community-based coping instruments

4. The Government of Bangladesh recognizes that shocks and vulnerability are mainstream problems for the poor. To address chronic poverty and vulnerability, the Government of Bangladesh (GoB) implements a large number of public social safety net (SSN) programs of varying sizes. These programs address poverty and vulnerability from a broad perspective, including through education, health, nutrition, employment, and disaster response programs targeted to the poor. Vulnerable groups, particularly the elderly, women, children, and disabled persons, are given priority in the delivery of safety net support, and is also emphasized in the Sixth Five Year Plan (SFYP) FY2011-2015. Programs provide benefits in the form of food, cash transfers, or a combination of the two, and are administered through the Government administrative bodies and elected local government officials.

5. Well designed and implemented safety nets not only reduce poverty and vulnerability, they have shown to improve women's wellbeing. Existing studies suggest that some of Bangladesh's safety net programs have shown to be effective at reducing poverty and improving gender outcomes. Participation in programs such as VGD (Vulnerable Group Feeding) and RMP (Rural Maintenance Program) has a significant positive impact on household food consumption, on female calorie intake and other measures of female empowerment. Safety nets have also shown to have a positive effect on mitigating both seasonal and non-seasonal food deprivation.

6. In the face of recent global food and energy price shocks Bangladesh was able to scale up coverage of several ongoing SSNs. The Employment Generation Program for the Poorest (EGPP) program was set up in 2008 in response to the 2007-2008 food price crisis to provide short term employment to more than 600,000 poorest households annually during the two lean seasons. The Open Market Sales (OMS) program was also used to provide about 900,000 tons of subsidized rice. Anyone is allowed to buy up to 5 kilograms of low quality rice per day through this operation. A Fair Price Cardholders (FPC) program resumed in November 2010 allowing some two million low income households to purchase up to 20 kilograms of rice per month at a below-market price. In addition, the Government initiated an input subsidy program in 2010, allowing farmers with less than 2.5 acres of land to open a bank account and receive a cash subsidy on diesel used in irrigation pumps. Allocations of other existing large food based SSNs such as Vulnerable Group Feeding

(VGF), Gratuitous Relief (GR), Food for Works (FFW) and Test Relief (TR) programs which are aimed at mitigating the adverse impacts of seasonal shocks and emergencies were also increased.

7. Workfare programs historically have been the Government's main response to reducing poverty and vulnerability. These programs combine two objectives: a safety net function to help smooth consumption during lean seasons and a community infrastructure function. Since the 1960s, the safety net and the infrastructure functions had been combined in an integrated model known as the Comilla model. The terrible famine of 1974 served to relegate the infrastructure function to the background and emphasized only the safety net function. After the consecutive floods of 1987 and 1988 when local infrastructure was severely damaged, the infrastructure focus of these programs re-emerged. However after the food price hike of 2007-2008, the pendulum swung back towards the safety net function of these programs.

8. Given Bangladesh's history of famines and catastrophic natural disasters, food based transfers have traditionally been the main form of income support to the poor. The Public Food Distribution System (PFDS) supplies food grains to various food-based safety nets, which account for around three-quarters of its total PFDS food grain distribution. In addition to the food based public works programs (FFW and TR) and the OMS, the three other largest food based programs include VGF, GR and Vulnerable Group Development (VGD) programs. While VGF has a pre-defined benefit package and focuses on food security needs of poor households, GR offers both food and other transfers (e.g. blankets, tin, cash, etc) to meet the needs of disaster-affected poor households. VGD on the other hand combines food based transfers with training on income generating activities, and is targeted exclusively towards groups of women.

9. Despite these interventions, large numbers of poor people remain out of reach of SSNs. Estimations from nationally representative household surveys (HIES 2005, 2010) suggest that even though the SSN coverage of poor has improved over time it nevertheless remains low: in 2010, a third of the poor participated in at least one social assistance program as compared to 21 percent in 2005. These results also suggest large scale inclusion errors among the SSN programs. The proportion of SSN programs recipients who are non-poor (i.e. leakage in coverage) increased from being 44 percent to almost 60 percent. Similarly, the share of total program spending accruing to the poor (targeting efficiency) dropped from 52.6 to 35.3 percent within the five year period. Average transfer adequacy (i.e. generosity) on average is also low, and has worsened over the years: the share of real value of transfers of the total consumption levels of poor households has almost halved, falling from 22 to 11 percent.

10. There is scope for better targeting of benefits of some of the largest SSNs. The five of the largest SSN programs are implemented by the Ministry of Disaster Management and Relief (MoDMR), and constitute a little more than a third of the total social protection budget (which was about 14% of the Government budget in FY13). These programs include the EGPP, FFW, TR, GR and VGF, and together these programs received an allocation of US \$678 million in FY13. According to a 2011 IFPRI survey that is nationally representative of rural Bangladesh, even though these programs are relatively more pro-poor than some of the other SSNs, there is scope for improved targeting of their resources. With its more stringent eligibility criteria relative to the other programs and bank-transfer payment system, EGPP is much better targeted than other SSN programs – it has the highest proportion of its beneficiaries who belong to the poorest twenty percent of the population compared to any other SSN program. Nevertheless, there is still room for improvement: around 29 percent of EGPP beneficiaries in 2011 were in the top three expenditure

quintiles of the consumption distribution. A 2010 household survey on EGPP show similar results: 22 percent of EGPP participants were from above the poverty line. In the case of VGF and GR 40 percent and 43 percent of their beneficiaries are from the top three quintiles respectively.

11. Beneficiaries do not always receive the full amounts of their entitlements or have full information regarding their entitlements. According to the HIES 2010, on average, there is a variation in the leakage in benefits by programs as reported by beneficiaries. While households reported their expectations for benefits under VGF and GR were 14 kg and 18 kg respectively, program guidelines report GR entitlements to be 20 kg, while in the case of VGF the range is between 10 to 20kg. These figures are in line with the existing evidence on leakage from transfer programs in Bangladesh: IFPRI estimates that the leakage of transfers at the beneficiary level can range between 2 and 13.6 percent (Ahmed et al. 2003).

12. There are several reasons why resources allocated may be diverted from their intended use. First, poor program design and implementation might cause part of the transfer to leak to non-poor beneficiaries. The second challenge is to prevent the benefit amount from being captured by program officials along the way. The extent of this problem has been found to increase with the number of intermediaries involved in the benefit delivery process as is the case in food based safety nets. Third, benefit amounts may also be less than stipulated because of unauthorized payments by the beneficiary to program officials. It is important to point out, though, that not all leakages and short payments are due to corruption. Often part of the benefits is used by program officials to recover the cost of bagging and transporting the food transfer. In the case of public works, part of the benefit is used often for non-wage costs associated with small infrastructure project implementation. In fact one of the innovations brought about in the case of EGPP was the introduction of allocating non-wage costs to minimize the leakage in program allocations.

13. The administration of food programs is difficult, partly driven by poor information systems that do not allow for sufficient monitoring and evaluation of program implementation. Although the economic benefit of these improved systems is difficult to estimate, a nontrivial example of how this information could help the government plan is in the timing of benefits. The two lean seasons during the months of Oct-Nov and March-April, when casual employment and food stocks are traditionally most scarce, are shaded. Perhaps coincidentally, the two lean seasons are covered but by different programs. The food-based workfare programs (FFW and TR) distribute most of their benefits in June, and provide almost no food aid during the most challenging lean season of October/November. There may be a range of operational explanations, including the necessity of conducting public works projects immediately before the monsoon season. However, the grain distribution pattern can also be partly explained by delays in forming project implementation committees. Having real time information on project performance would make it easier for the MoDM to plan the program implementation in a coordinated fashion, and thereby ensure the timeliness of program implementation which is critical for reducing vulnerability.

14. The MoDMR recognizes these challenges with regards to coverage, targeting, leakage and administration of these programs, and has requested IDA support to improve their performance. A more effective targeting and efficient program administrative system that improves beneficiary identification and reduces opportunities for leakage in benefit amount could substantially increase the coverage of poor households within the existing budget envelope and have a larger impact on poverty. Basic simulations using household and program level data suggest that indeed under conditions of improved targeting of resources and reduced leakage in existing benefit amounts,

these programs alone have the potential to reduce the 2010 rural poverty headcount rate from 34.6% to around 34.1%. This translates to an additional half a million individuals being lifted out of poverty. Alternatively, holding the poverty headcount constant, with a more efficient targeting system combined with no leakage in benefit amounts, these programs would collectively achieve their existing poverty reduction impact with 45 per cent fewer funds. Utilizing these additional funds to increase the size of benefits could potentially have a larger impact on poverty if they are targeted to the poorest population.

15. Thus, the broad objective of the proposed project is to assist the MoDMR in developing an integrated system of safety nets administration that focuses on improved targeting, and efficient and transparent implementation. Investing in these systems for implementing these large safety nets would not only help to increase a much needed coverage of the poor in the short term, it would also help GoB improve the quality of a large amount of public expenditure earmarked for social protection in the medium term.

Sectoral and institutional Context

16. Bangladesh possesses significant experience in providing assistance to the poor through SSN programs. Although some of the programs started as early as in mid-1970s, the administrative structure and the implementation mechanisms have gone through substantive changes over the years. The most notable changes include transforming relief programs to development programs, converting ration price subsidies to targeted food distribution, and engaging other stakeholders such as Non-Government Organizations (NGOs) and microfinance organizations in the implementation of various safety net programs. The current structure of the social protection landscape in Bangladesh where there are a large number of programs that are not well coordinated and harmonized, is to a large extent determined by these initial conditions that created a space for experimentation and innovation in social protection services offered by both public and private actors.

17. Allocations towards SSNs, including those implemented by MoDMR have increased over time. The GoB's commitment to the fight against poverty and vulnerability is evidenced by increased budgetary allocations for social protection programs in recent years. The Government provided an average of 12 percent of total annual public expenditures (about 1.8 percent of GDP) for social protection during 1996-2008. Since then the allocation was increased in response to recent global food and energy price crises to about on average 14 percent of the total budget over 2009-2012, and reached as high as 2.64 percent of GDP in FY11. This was partly aided by the increasing fiscal space in view of steady growth rates of on average 6 percent over the recent years. Allocations for the MoDMR programs have also increased steadily, the steepest increase being in 2008-2009, the year following the food price crisis.

18. There is a wide spectrum of programs under the rubric of social protection expenditures. Social protection expenditures can essentially be grouped under a number of broad categories across 99 programs. The major safety net programs include food based emergency/seasonal relief and public works programs, followed by cash allowance programs geared towards vulnerable groups and other special groups such indigenous populations, widows, the disabled and freedom fighters. Education stipend programs are also counted in the social protection budget, as are agricultural programs aimed at supporting farmers. Micro-credit and rural employment type programs and programs addressing climate change also constitute a relatively large share of the social protection

budget.

19. The ten largest programs constitute over 70 percent of the total social assistance budget. These programs are implemented by six agencies, namely the (i) Ministry of Social Welfare, (ii) the Ministry of Food, (iii) the Ministry of Disaster Management and Relief, (iv) the Ministry of Women and Children's Affairs, (v) the Ministry of Primary and Mass Education, and (vi) the Ministry of Secondary Education. A host of other Ministries implement the remaining allocation spread across numerous programs.

20. SSN expenditures are geographically targeted, and programs are mainly concentrated in rural areas. There has been a substantial expansion in the coverage of safety nets over the recent years, consistent with the increase in expenditures over that period. About a quarter of households benefited from at least one safety net program in 2010, compared to only 12 percent in 2005. The success of the geographic targeting process is underscored by the fact that coverage rates are closely correlated with division level poverty rates. This represents a significant improvement over time: in 2005, the coverage of safety nets was negatively correlated with regional level poverty rates.

21. A sizeable number of non-poor households continue to receive benefits. SSN programs are on balance progressive, with around two fifths of beneficiaries coming from the poorest twenty percent of the population. However there are large inclusion errors, with coverage in the richest two quintiles more than doubling during the period 2005-10. Thus while resource allocation across areas are pro-poor, within area targeting of resources at the household level could be further improved. Targeting errors are exacerbated by the complexity and misapplication of program rules. In some programs, multiple criteria are used to target benefits to the same income group. Targeting criteria are not always applied, and surveys have shown that beneficiaries rarely fulfill all the criteria. In some cases the indicators used to identify the poor are difficult if not impossible to observe and verify.

22. There are also a large number of intermediaries in the delivery of program benefits, particularly for food based programs. For example, the VGD and other food based public works programs that depend on the PFDS, with food being loaded and unloaded at a number of points before finally being delivered to beneficiaries. A distinguishing characteristic of the RMP and EGPP, which have an estimated leakage of less than 5% of total allocation, is that they appear to have few intermediaries, or at least none that are able to intervene in the cash payment process at any point.

23. The administration of the food based programs is difficult and costly, and a movement towards cash based transfers would improve program efficiency. A 1993 IFPRI study estimates suggest that the FFW program delivered Taka 1 of income to a participating household at a cost of Tk 1.8-Tk 2.4. Compared with FFW, the cash-based RMP was more cost-effective: RMP delivered one taka of income to a targeted household at a cost of only Tk 1.2. There are no recent evaluations of these programs with which to update these estimations. In the case of the VGD and VGF, local government officials are responsible for collecting grains from the local depot and making deliveries to beneficiaries. The cost of collecting and distributing food is not fully paid by the program. This often leads to further leakage. For cash programs, the cash can be transferred through banks or other formal financial channels such as mobile phones and postal cash cards. For example in the case of EGPP, the beneficiary opens a passbook account at the local bank and payments are made straight to the beneficiary account based on the recommendation of local government officials.

24. Social safety net programs have gradually shifted from food transfers to cash transfers. In 2005, the bulk of public transfers in Bangladesh were allocated to more expensive food transfer programs. Over time, the Government has boosted cash transfer programs, and thereby their share of total program spending. The Food-for-Education program was transformed into a cash-based stipend program, and Cash-For-Work has been gradually incorporated into the FFW and TR programs. The EGPP, introduced in 2008, is a wholly cash-based program. The increased emphasis on cash transfers reflects a recognition of their greater cost effectiveness and lower risk of misappropriation.

25. Nevertheless, food transfer programs remain an important pillar of Bangladesh's food security strategy, and serve a secondary role in turning over the country's emergency grain supplies. Phasing out food-based transfer programs is therefore a nontrivial process which will require technical assistance, dialog and careful long term planning

26. There is an increased recognition by the MoDMR and the Ministry of Finance, for a strong focus on improving the targeting and administrative capacity of SSNs, partly driven by the relatively successful performance of the EGPP. The Government requested for World Bank financial and technical support for EGPP in 2009, which was subsequently approved in November 2010. The focus of this US\$150 million results based project implemented by MoDMR is on bringing governance improvements in the program via rigorous targeting at the geographical, household and gender levels; improved governance through clearer rules and enhanced transparency in payment mechanisms; and stronger accountability via a robust monitoring and evaluation system. Bank financing has been provided based on achieving these results, and has been used to finance one-third of the total cost of the Program. The project has a rigorous monitoring and evaluation framework including both quantitative and qualitative evaluations as well as third party monitoring arrangements.

27. Third party evaluation shows that leakage in the EGPP has come down from previous years. According to this study conducted independently by IFPRI the self-targeting feature of the program is also working relatively well. Other third party process evaluations conducted by PPRC suggest incremental improvements in the implementation of the program but also highlight challenges yet to overcome such as weak worker attendance verification and grievance mechanisms. Given these initial positive results, the GoB has increased allocations to the EGPP program by 20 percent in FY13, and has also increased allocations towards the poorest regions of Bangladesh. That GoB requested for a similar IDA support for the remaining SSNs implemented by MoDMR through its implementing agency, the Department of Disaster Management (DDM) in May 2012 is a testament to the increased recognition of the benefits of incremental reform measures adopted under the EGPP project.

28. Encouraged by the results achieved under EGPP, the GoB is exploring ways to reduce food based transfers through SSNs without adversely affecting the PFDS. The evidence on leakage in benefits while somewhat mixed and varied across programs, suggests higher leakage from food transfer programs. There are large number of intermediaries in the PFDS, as well as complexities surrounding procurement, distribution, and storage of food. Eventually it would be more cost-effective if all public works programs were consolidated under a common program such as EGPP, and is made cash-based. However given that a large amount of food based transfers are distributed via local politicians, the political economy challenges of large scale reform of these programs are formidable. The MoDMR is fully cognizant of these challenges, and is taking an incremental

approach to bringing about politically difficult reforms. An example is their willingness to convert a portion of the transfers under TR into cash under the proposed project. If successful, this process has the potential to initiate the consolidation of safety nets as well as the movement away from food to cash based transfers. It is important to note however, that a complete shift from food to cash based transfers can only happen once GOB has developed a more cost-effective public food stocks management system that does not rely on safety net programs to rotate public stocks.

29. GoB is also committed to developing the Bangladesh Poverty Database (BPD) of poor households based on Proxy Means Tests (PMT) to help establish a better targeting system for SSNs. The Bangladesh Bureau of Statistics (BBS) has been tasked by the Cabinet Division to develop a database of poor households. The rationale for this initiative is to allow safety net programs adopt a more coordinated approach to targeting their beneficiaries more accurately, as has been done in many other countries. Given the need for substantial resources to implement this activity, MoDMR has also requested for IDA assistance for technical support for BBS to develop this targeting system based on global good practice. This will benefit not only the programs implemented by MoDMR but also the large number of other targeted safety net programs implemented by other Ministries.

30. Simulation analysis suggests adopting a PMT based targeting mechanism is likely to improve the targeting efficiency of SSNs. This method of targeting which has been adopted in many parts of the world, identifies key characteristics of the poor from household data and uses these to develop a database of household level “poverty scorecard” with which to select the poor. Simulation analysis shows that using a PMT based targeting system can predict the poor fairly well and could outperform the current targeting performance of a number of key SNs. Except for VGD, most of the other programs have on average of about 30 percent of their beneficiaries who belong to the bottom quintile. Using a cut-off point of 20th percentile, around 66 (90) percent of the beneficiaries could potentially be drawn from the bottom 20 (40) percent of the population. This is of course an upper bound since the simulation assumes 100 percent uptake and perfect implementation.

31. Improving the targeting of SSNs implemented by MoDMR will result in an improvement in the quality of a sizeable portion of public expenditures. The total allocation for these programs was US\$623 million in FY12. To simulate the effect of improved targeting, we compare household consumption under the existing targeting rules with the consumption that would be observed if the existing budget were allocated according to the endline PMT based targeting rules. Re-estimating the cutoff score to correspond to the 30th percentile of the rural population, the results show that the five programs presently reduce the rural poverty headcount of 34.6 percent (relative to the official upper national poverty line of 31.5 percent) by between 0.5 and 1 percentage point. For example, if we simulate consumption excluding these transfers, the poverty rate would be 35.6% rather than 34.6%. This implies that the programs currently reduce the number of poor individuals in Bangladesh by around 1 million. Under the endline PMT based targeting formula (coupled with geographic targeting), the poverty headcount would fall to 34.1%, a further half a million individuals lifted above the poverty line. Such reform measures are likely to allow both the expansion of coverage of poor households and increase in per capita benefit levels within the existing budget.

32. The Bank is well-positioned to support the MoDMR in the improved management and administration of its SSN programs, and more accurate targeting of benefits to the poor. The on-going support for EGPP and its successful implementation through a DLI-based IDA credit which closes on June 30, 2014 has resulted in a strong partnership between the Bank and MoDMR.

Through the Bank's operational engagements in other developing countries, as well as through various analytical studies on poverty and safety nets, the Bank has established itself as a knowledge organization that is well positioned to bring international good practice to bear. The proposed results-based operation titled Safety Net Systems for the Poorest (SNSP) Project plans to continue support for EGPP as well as support improved implementation of the additional programs - FFW, TR, GR, and VGF. This will allow the MoDMR to leverage global good practices in the areas of building targeting, program administration and M&E systems, and lead these programs along an incremental reform path to better serve the needs of the poor.

II. Project Development Objectives

The Project Development Objective is to improve the equity, efficiency and transparency of major social safety net programs to benefit the poorest households.

III. Project Description

Component Name

Support to MoDMR Safety Net Programs

Strengthening of MoDMR program administration and transparency

Development of the Bangladesh Poverty Database

IV. Financing (*in USD Million*)

For Loans/Credits/Others	Amount
BORROWER/RECIPIENT	2170.00
International Development Association (IDA)	500.00
Total	2670.00

V. Implementation

The Ministry of Disaster Management and Relief (through DDM) and the Statistics and Informatics Division (through BBS) will be the two implementing agencies for the proposed project. Project Directors (PDs) not below the rank of Joint Secretary, at both DDM and BBS, would be appointed to ensure smooth implementation and supervision of the project.

The Director General, DDM, would serve as the PD for the Ministry of Disaster Management and Relief (i.e. for Components 1 and 2) and would be assisted by an implementation team in day-to-day project management. The implementation team will comprise of existing DDM officials including: (1) Director, Administration & Finance; (2) Director, FFW/TR/EGPP ; (3) Director, VGF; (4) Director, GR; (5) Director M&E; as well as specialists hired as consultants for the project period. These positions include one Financial Management Specialist, one Procurement Specialist, one Training & IEC Specialist, one IT Specialist, two Program (Social Safety Net) Specialists, along with support staff as needed. The Office of the Project Director (OPD) set up under the EGPP Project will continue to oversee the EGPP until June 2014. After completion of the EGPP Project, the implementation team at DDM, specifically the Director of other two public works programs (FFW and TR) would be responsible for EGPP.

The Director General, BBS, would serve as the PD for the Statistics & Informatics Division (i.e. for Component 3) and would be assisted by a Deputy PD (not below the rank of a Deputy Secretary) in day-to-day project management. The implementation team at BBS will include one Financial

Management Specialist, one Procurement Specialist, one Training & IEC Specialist, one Database Management Specialist, Systems Management Specialist, and support staff as needed.

Both implementation teams will be advised and guided by a National Steering Committee (NSC) co-chaired by the Secretaries of the Ministry of Disaster Management and Relief and the Statistics and Informatics Division. The NSC will provide an oversight function to ensure that activities under both DDM and BBS are well coordinated. Technical Project Review Committees (TRPCs), headed by the respective PDs of DDM and BBS and facilitated by the Bank, will further assist in the supervision of the project at all levels. These Committees will ensure that Project implementation follows both Government and Bank rules and regulations.

At the district level, the District Relief & Rehabilitation Officer (DRRO) will be the focal point for implementation of the MoDMR component, under the overall supervision and guidance of the respective Deputy Commissioner. At the Upazila level, the Project Implementation Officer (PIO) will be the primary official for all DDM program related processes, and would be supported by a Field Supervisor (approximately 500 in total), hired on a contractual basis under the Project. An Upazila Committee, headed by the Upazila Nirbahi Officer (UNO), will be responsible for reviewing beneficiary and community workfare program proposals, beneficiary participation, as well as authorizing payments for all DDM programs, in conjunction with the PIO. At the Union Parishad (UP) level, Union Committees headed by the UP Chairman will be responsible for the implementation and supervision of the different DDM programs. A grievance redress system will also be set up at the national, district and upazila levels as part of the management information system (MIS) to be developed under the project.

BBS activities at the Upazila level (approximately 500 staff) would also be supported by BPD Operators, hired on a contractual basis under the Project. These BPD Operators would work with the respective UNO and PIO to ensure that the poverty database is properly utilized in the selection of beneficiaries for DDM programs once it is operational, as well as maintained for regular updates and for addressing appeals and grievances.

VI. Safeguard Policies (including public consultation)

Safeguard Policies Triggered by the Project	Yes	No
Environmental Assessment OP/BP 4.01	x	
Natural Habitats OP/BP 4.04		x
Forests OP/BP 4.36		x
Pest Management OP 4.09		x
Physical Cultural Resources OP/BP 4.11		x
Indigenous Peoples OP/BP 4.10	x	
Involuntary Resettlement OP/BP 4.12		x
Safety of Dams OP/BP 4.37		x
Projects on International Waterways OP/BP 7.50		x
Projects in Disputed Areas OP/BP 7.60		x

VII. Contact point

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