Report Number: ICRR0023933

1. Project Data

Project ID	Project Name	
P158078	TG-Economic Governance	
Country	**Practice Area(Lead)**	
Togo	Governance	
L/C/TF Number(s)	**Closing Date (Original)**	**Total Project Cost (USD)**
IDA-D2340,TF-A8463	31-Oct-2022	18,328,872.83
Bank Approval Date	**Closing Date (Actual)**	
03-Oct-2017	30-Jun-2023	

	IBRD/IDA (USD)	Grants (USD)
Original Commitment	15,000,000.00	4,500,000.00
Revised Commitment	19,500,000.00	4,500,000.00
Actual	18,328,872.83	4,231,173.03

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2. Project Objectives and Components

a. Objectives

According to the Financing Agreement (FA, p. 5) and the Project Appraisal Document (PAD, p. 15), the Project Development Objective (PDO) was:

“ To improve public investment management, domestic revenue mobilization and public accountability and monitoring mechanisms for better service delivery in priority sectors.”

For the purposes of this review the PDOs have been parsed as follows:

1. To improve public investment management;
2. To improve domestic revenue mobilization;
3. To improve public accountability and monitoring mechanisms for better service delivery in priority sectors.

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

No

c. Will a split evaluation be undertaken?

No

d. Components

There were four components as follows:

Component 1: Management of Public Investments and Public-Private Partnerships (PPPs). The estimated cost at appraisal was US$ 6.06 million (US$ 5.5 million from International Development Association (IDA) Grant and US$ 0.56 million from the European Union (EU) Trust Fund (TF) administered by the Bank). The actual cost was as estimated.

This component aimed to improve the effectiveness of Public Investment Management (PIM). There were three subcomponents:

1. enhancing planning/programming of public investments (including strengthening selection and implementation of PPPs);
2. selecting and budgeting of high-quality public investments; and
3. improving implementation of public investment projects.

The first restructuring (discussed below) added a new subcomponent: (iv) strengthening the capacity of the ministry of economy and finance in supporting the COVID-19 response.

Component 2: Supporting Domestic Resource Mobilization (DRM). The estimated cost at appraisal was US$ 7.20 million (US$ 6.0 million from IDA Grant and US$ 1.2 million from the EU TF). The actual cost was as estimated.

This component aimed to support DRM by strengthening the tax policy and its implementation. There were three subcomponents:

1. strengthening capacity for tax policy;
2. broadening the tax base through administrative improvements; and
3. enhancing the quality of tax payer system to promote voluntary compliance.

Component 3: Increasing Public Accountability and Citizen Engagement. The estimated cost at appraisal was US$ 3.98 million (US$ 1.5 million from the IDA Grant and US$ 2.48 million from the EU TF). The actual cost was as estimated.

This component aimed to enhance public accountability and promote citizen engagement in the budget process. There were three subcomponents:

1. strengthening the capacities of formal oversight and accountability institutions;
2. strengthening civil society engagement in the budget process;
3. strengthening citizen engagement in priority sectors (maternal and child health), primary education, and urban water supply).

Component 4: Project Implementation support. The estimated cost at appraisal was US$ 2.56 million (US$ 2.00 million from the IDA Grant and US$ 0.56 million from the EU TF). The actual cost was as estimated.

This component aimed to support project coordination. There were two components: (i) support for project management and reform coordination; (ii) support for monitoring, evaluation, independent review, and communication.

US$0.80 million of the IDA grant was unallocated at appraisal.

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

Project Cost: The estimated cost at appraisal was US$19.50 million. The actual cost was US$ 18.32 million.

Financing: The project was financed by an IDA grant of US$ 15.00 million and a EU TF of US$ 4.50 million. The total financing for the project was US$19.50 million. The total amount disbursed was US$ 18.32 million (US$ 14.07 million of the IDA grant and US$ 4.23 million of the EU TF). The difference between the appraisal estimate and amount disbursed was due to the savings realized during implementation.
The difference in the amount from the EU TF in the PAD and the ICR was due to the currency changes during implementation.

Borrower Contribution: The Republic of Togo had not planned and did not provide counterpart funding during implementation.

Dates: The Bank approved the project on October 3, 2017, and the project became effective on April 20, 2018 with an original closing date of October 22, 2022. However, the project closed eight months behind schedule on June 30, 2023.

Other changes. There were two level 2 restructurings during the project lifetime.

The main changes made **through the first restructuring on August 3, 2020** (ICR, p. ii):

- Savings realized during realization were utilized for scaling up activities to support the Government's efforts to address the COVID-19 health crisis.

- Grant proceeds were reallocated for carrying out additional activities.
- A new Intermediate Results Indicator (IRI) was added related to transparency of debt management.

The main change made **through the project restructuring on October 25, 2022:**

- The closing date was extended by eight months from October 31, 2022, to June 30, 2023 for completing the ongoing activities that were delayed in the wake of the COVID-19 pandemic

3. Relevance of Objectives

Rationale

Country context: Togo was emerging from years of isolation, donor disengagement, and economic mismanagement that deteriorated the fiscal situation and weakened the financial management (FM) system at appraisal. When this project was under preparation, the World Bank had classified Togo as a fragile, conflict-affected state (FCS) due to its weak governance capacity. The Togo Risk and Resilience Assessment (RRA, 2023) identified weak governance as the main source of fragility and impediment to Togo's development. Togo exited FCS status in 2020.

Sector context: The Bank prepared this project in a context in which development outcomes in Togo were constrained by Public Financial Management (PFM) challenges, such as issues relating to budget credibility, predictability and execution. To ensure adequate service delivery, Togo also needed to enhance the efficiency of its public investments, increase its DRM capacity, and address accountability and monitoring of institutions.

Bank strategy: The project's PDO was well aligned with the *World Bank's Country Partnership Framework* (CPF) FY17-FY20 and the Bank's 2016 Systematic Country Diagnostic (SCD) at appraisal. The CPF emphasized strengthening governance, including strengthening institutions and accountability, as a cross-cutting theme. The governance theme focused on: (a) addressing transparency and efficiency of PFM, DRM, and PIM, including PPPs; (b) decentralizing service delivery to bring decision making closer to citizens; (c) enhancing citizen engagement in monitoring of budget execution in key sectors; and (e) combating corruption through more effective public oversight of institutions.

The PDO is well-aligned with the current Bank strategy for Togo. The SCD that was updated in March 2023, and which was to be the basis for the Bank's upcoming CPF, reiterated weak governance as a foundational constraint to Togo's growth and development. The SCD (2023) specifically highlighted the importance of strengthening PFM, increasing DRM, increasing the effectiveness of public spending, modernizing public administration, and improving delivery of essential services.

Government strategy: The PDO was well-aligned with the government's strategic vision of development articulated in the *National Development Plan (NDP) (2018 - 2022)* and *Strategy for Accelerated Growth (*SCAPE). The NDP identified "*Strengthening governance and consolidating peace*" as a crucial objective. *T*he PDO *was* in line with the government's *Vision 2030* which identified the need for reinforcing capacities of local and national actors; mobilizing resources and strengthening management of public finances (PAD.

P 14). SCAPE acknowledged serious challenges in the governance system and articulated the need for improving governance and promoting sustainable and participatory development.

Previous Bank experience: The project was aligned with its CPF, and complemented other operations, including a parallel Bank-financed Development Policy Operation (DPO). The project activities were grounded in robust analytical works such as the Public Expenditure and Financial Accountability (PEFA), Public Investment Management Assessment (PIMA), Public Expenditure Management and Financial Accountability Review (PEMFAR) and the Bank's 2016 SCD. A Project Preparation Advance (PPA) helped to ensure a quick start to implementation.

The overall level of ambition of the project was appropriate, given that at approval, Togo had not yet exited its fragile status and had weak implementation and governance capacity. With the savings realized during implementation, the level of ambition of the project scope was expanded. Therefore, the overall relevance is rated as High.

Rating

High

4. Achievement of Objectives (Efficacy)

OBJECTIVE 1

Objective

To improve public investment management

Rationale

Theory of Change. The project aimed to address the weaknesses in the management of public investments. The TOC held that effective coordination of investment planning between sectors and budget units, public investment management tools, standardized cost-benefit analysis for public investment projects and monitoring, systems for training and public investment professionals and setting a framework for selecting PPPs were likely to aid in enhancing planning of public investments. It held that identification of mature projects and developing tools for securing funding, developing annual performance plans, work programs and performance reports of priority sectors, and adapting the information management system to the requirements of program budgeting were likely to aid in selecting high-quality public investments. Dissemination of procedures for new procurement tools and developing information tracking systems for expediting procurement, were likely to help in enhancing implementation of public investments. This combination of activities was expected to help in improving the management of public investments. The causal links activities, outputs and outcomes were logical and the intended outcomes were monitorable.

Outputs

- A website dedicated to the activities of the Directorate General of Budget and Finance (DGBF) was operational when the project closed for disseminating budget information. The 2023 budget integrated the criteria of equity and equality with gender-sensitive budgeting.(Gender budgeting would make it possible to identify the differentiated impact of public budget income and expenditure on women and men and to propose measures to redress any discrepancies). From 2024, the budget was to include aspects of climate change and environmental protection.
- The project provided support for operationalizing the program budget and annual performance reports. The project provided capacity building to the line ministries on the new Program-based Budgeting approach. When the project closed, 69% of the 31 Togo's Public Expenditure and Financial Accountability (PEFA) indicators obtained a grade equal to or higher than C (the basic standard), compared to 40% in 2016.
- The project aided in preparing a public procurement strategy. Togo was the first country in the West African Economic and Monetary Union (WAEMU) to develop such a strategy. Togo's PEFA rating for procurement improved to B+ in 2023, compared to B in 2016.
- Three Annual Debt Reports were published, exceeding the target of two. A Medium Term Debt Strategy (MTDS) for 2020 – 2024 was completed as targeted.
- New Public Investment guidelines and manual were developed for screening public investment projects through a cost-benefit analysis.
- The project aided in providing support in the wake of the COVID-19 pandemic.

Intermediate outcomes.

- All major public investment projects (including PPPs) utilized an economic and cost-benefit analysis for appraising investments (as compared to none at the baseline) and far exceeding the target of 30%.
- There was only one percent difference between Public Investment Program, Sectoral Medium Term Budget Framework (DPPD) and Finance Law in priority sectors, as compared to 15% at the baseline and far exceeding the target of 5%.
- Three annual debt reports were published when the project closed, exceeding the target of two.

Outcomes

The outputs described above were expected to contribute to increasing the percentage of public investment projects that were appraised and approved for financing according to the Public Investment Management guidelines developed under the project.

- All public investment projects approved for financing adhered to the Public Investment Management guidelines when the project closed, far exceeding the target of 50%.

Efficacy of this PDO is rated as High.

Rating
High

OBJECTIVE 2

Objective
To improve domestic resource mobilization

Rationale
Theory of Change. The project activities aimed at mobilizing domestic resources through strengthening the capacity for tax policy, broadening the tax base and promoting voluntary compliance.

The TOC held that simplifying the tax system and training staff in the Policy Unit responsible for revenue forecasting were likely to help in strengthening capacities for tax policy. In addition, the tax registration campaign, integration of customs and tax information, capacity building for auditors, an electronic system of taxpayer filing and documentation were likely to contribute to broadening the tax base. Action plans to respond to taxpayers' grievances, and a targeted outreach and information campaign were likely to help in promoting voluntary compliance. The combination of these activities were expected to help improve domestic resource mobilization. The causal links between project activities, outputs and outcomes were logical and the intended outcomes were monitorable.

Outputs

- A new tax simpler code was adopted in 2018 as targeted.
- A tax census was conducted in 2018 in Greater Lomé. This was followed by a broader tax census in the interior of Togo in 2022 as targeted.
- The Togolese Revenue Authority (OTR) acquired equipment for modernizing land registry services. OTR staff were trained in the ISO 9001 Quality Management System (QMS). A pilot phase of digitizing land registry services was completed as targeted.
- A Tax Policy Unit (UPF) was established as targeted. This contributed to financing salaries of key staff and developing a Strategic Action Plan.
- The project's support for OTR and UPF operations contributed to a 46.3 percent increase in tax revenues in Togo between 2017 and 2022. Value Added Tax (VAT) collection for small and medium enterprises grew by 27 percent between 2018 and 2021.
- Report on tax expenditure evaluation was completed and appended to the Finance bill from 2023, for complying with WAEMU's convergence criteria.

Intermediate outcomes

- The number of national tax instruments reduced from 29 to 13, exceeding the target of 15.
- The tax and customs information were integrated as targeted for automatic reconciliation of VAT and customs declarations.
- 23 OTR's qualified operational staff were deployed for field audits, far exceeding the target of 15.
- The time taken to process files and reply to taxpayers reduced from 12 days at the baseline to 1, exceeding the specified target of 6 days.

Outcomes

The outputs described above were expected to increase the percentage of tax payers who were filing returns.

- The share of total taxpayers who were filing returns in Lomé increased from 0% at baseline to 36.9% when the project closed, far exceeding the 15% target.
- Taxpayers filing tax returns in Lomé with a turnover exceeding 10 million CFAF increased from 0% at baseline to 38.5% when the project closed, exceeding the 30% target.

Efficacy of this PDO is rated as High.

Rating
High

OBJECTIVE 3

Objective
To improve public accountability and monitoring mechanisms for better service delivery in priority sectors

Rationale
Theory of Change. The TOC held that addressing the weaknesses in the public accountability and monitoring mechanisms, specifically, strengthening the capacity of formal oversight and accountability institutions, strengthening civil society engagement in the budget process and citizen engagement in priority sectors would improve public accountability and monitoring mechanisms for better service delivery.

Risk mapping of targeted sectors, implementing a risk based approach and executing multiyear strategic audit plans and a strategic plan for the newly created Court of Accounts (CdC, Cour des Comptes), Technical Assistance (TA) to the Inspector General of Finance on conducting internal audits, and training staff on PFM regulations were likely to help in strengthening the capacity of accountability institutions. In addition disseminating citizens' budget, training of Civil Society Organizations (CSOs) and the government officials on using BOOST (Togo's public budget database), capacity building of the CSOs in budget tracking were likely to help in strengthening civil society engagement in the budget process. The development of citizen report cards and tools to address service delivery challenges were likely to help in strengthening citizen engagement in priority sectors. The causal links between activities, outputs and outcomes were logical and the intended outcomes were monitorable.

Outputs

- Financial and technical support was provided as targeted to the Court of Accounts (CdC), local elected representatives, and other actors in managing public funds and for producing audit reports.
- A risk-based audit strategy was developed as targeted.
- The annual budget was published online as targeted.
- The project helped in assessing public service delivery in the subsectors of maternal and child health, urban water supply, and primary education.

Intermediate outcomes

- Six report cards were produced to provide the Ministries, Departments and Agencies (MDAs) with citizen feedback on quality of service delivery for maternal and child health, primary education, and urban water supply, as targeted.
- Three regular publications of citizens' budget, which integrated the criteria of equity and equality with gender-sensitive budgeting were published since 2020 as targeted.
- 1,115 government and CSO staff were trained in accountability, citizens engagement mechanisms and PFM, far surpassing the target of 400. 21% women were trained in citizens engagement mechanisms and PFM, surpassing the target of 21.

Outcomes

The outputs described above were expected to contribute to increasing the percentage of citizens who expressed satisfaction with the the service delivery in priority sectors and increasing the percentage of large taxpayers who were satisfied with the responsiveness of OTR.

- Satisfaction between 2020 and 2022 with the quality of and access to basic services in maternal and child health increased from 42% to 61%, in primary education from 61% to 68%, and in urban water from 50% to 68%. In maternal and child health and urban water, the results exceeded the targets of 52 and 60% respectively. In primary education, the result was below the target of 71.4%.
- Satisfaction rate of large taxpayers rose from 43.8% at the baseline to 65% in 2021, exceeding the target of 60%.

Efficacy is rated as substantial, given that most of the outcomes were realized.

Rating
Substantial

OVERALL EFFICACY

Rationale
Overall efficacy is rated as substantial, given that outcomes were realized in most cases.

Overall Efficacy Rating

Substantial

5. Efficiency

Economic Efficiency: An Economic rate of return (ERR) was not conducted at appraisal, as it was not required for fragile countries. The PAD included a financial analysis on a few quantifiable benefits of Component 2 activities on increasing fiscal space. The PAD cited a work by the International Monetary Fund (IMF), *Making Public Investment More Efficient,* which indicated that moving from the lowest quartile where Togo was at appraisal, with a public investment efficiency of 30 percent, to the highest quartile, could double the impact of that investment on economic growth. This in turn could add 3 to 4 percentage points of Gross Domestic Product (GDP) (PAD p. 33).

The ICR conducted an Economic and Financial Analysis (EFA) of the project. Two types of economic benefits were considered in the EFA: (i) higher public investment due to improved public investment management; and (ii) higher revenue collected due to increase in DRM. Based on this analysis, the Net Present Value (NPV) was US$177.00 million (more public investment) and an Internal Rate of Return of 197%. For the revenue collection side, increased registration supported by the tax census, yielded an increase in VAT collection by about 2.85 percent between 2018 and 2021 which was expected to result in a 5.6 increase in VAT collection between 2018-2022.

Operational efficiency. The project demonstrated good value for money, given the fragile country context. The actual project cost was lower than the appraisal estimate, due to the savings realized during implementation. The savings were utilized to support the Government's efforts in the wake of the COVID-19 pandemic. Although the project closed about eight months behind schedule, this was partly due adverse exogenous factors over which the project closed (the restrictions in the wake of the COVID-19 pandemic).

In sum, efficiency is rated as substantial.

Efficiency Rating

Substantial

a. If available, enter the Economic Rate of Return (ERR) and/or Financial Rate of Return (FRR) at appraisal and the re-estimated value at evaluation:

	Rate Available?	Point value (%)	*Coverage/Scope (%)
Appraisal		0	0 ☐ Not Applicable
ICR Estimate	✓	197.00	0 ☐ Not Applicable

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

6. Outcome

The PDO was highly relevant to the Government strategy and the Bank strategy for Togo. Overall efficacy is rated as substantial, given that the outcomes were realized for the most part. Efficiency is rated as substantial as the project demonstrated good value for money in a fragile context. Taking these into account, overall outcome is rated as Satisfactory.

a. Outcome Rating

Satisfactory

7. Risk to Development Outcome

Government Commitment/ownership. The ICR (para 91) noted that the Government is highly committed to the Public Investment Management Reforms, including strengthening the process of developing, implementing and monitoring the Public Investment Program. However, the Government still needs to complete the shift from incremental to program-based budgeting. The risk to development outcome is rated as moderate.

Financial risk. There is moderate risk that the deterioration of the fiscal situation after the COVID-19 pandemic could undermine the implementation of sustainability plans by the Government.

8. Assessment of Bank Performance

a. Quality-at-Entry

The project design responded directly to the Government's NDP (2018-2022), the PFM Strategy and the Bank's CPF. This helped in sustained government ownership. Project activities were well-grounded in previous robust analytical works including the PEFA, the PIMA, the PEMFAR, and the Bank's SCD. This helped in focusing on realistic project interventions that were feasible in the project's time frame. The project had a Project Preparation Advance (PPA) which enabled a quick start to project effectiveness and implementation, The Bank prepared this project in close collaboration with the EU, which had a track record in engaging in PFM policy dialogue in Togo.

The project was implemented under the overall leadership of the MEF. Implementation arrangements included a Project Coordination Unit (PCU) in charge of day-to-day implementation. A project Steering Committee (PSC) chaired by the Permanent Secretary (SR-PRPF) and comprising the key project stakeholders, was responsible for overall policy guidance (PAD, para 19). The implementation arrangements were appropriate as project performance was not undermined by the implementation arrangements made at appraisal.

The Bank identified several risks at appraisal, including political and governance risks (given the country's long standing political fragility) and , macroeconomic risks due to the high public debt levels and fragile fiscal sustainability. The Bank incorporated several mitigation measures. These measures were appropriate as project performance was not hampered by the risks identified at appraisal (ICR, p. 31-32).

The measures for fiduciary compliance were appropriate (discussed in section 10).

However, the absence of a standard and complete cost-benefit analysis at appraisal was a missed opportunity to better understand the economic context. The ICR doesn't mention this aspect (p. 23).

Quality-at-Entry Rating
Satisfactory

b. Quality of supervision

The Bank's team had regular supervision missions, including joint missions with the EU. These missions included site-visits. The project benefited from continuity of leadership. The Task Team Leader (TTL) and key team members were based in Togo from 2019. This helped in consistent engagement with the relevant Government counterparts. The Bank conducted a Mid--Term Review (MTR) one month earlier than planned, in May 2021. The bank team was proactive in responding to the challenges that rose during implementation through the two project restructurings and in the face of the challenges emerging from the COVID-19 pandemic through telecommuting.

There was one minor shortcoming. The supervision team could have increased the project's ambition in the second restructuring, given that at the time the project had attained all its objectives and there were still some unutilized savings.

In sum, overall Bank performance is rated as satisfactory.

Quality of Supervision Rating
Satisfactory

Overall Bank Performance Rating
Satisfactory

9. M&E Design, Implementation, & Utilization

a. M&E Design

The results framework was clear and the theory of changes clearly articulated the clear causal links between project activities, outputs and outcomes. The indicators were for the most part appropriate for monitoring project performance. The baseline and targets were clearly specified at design. However, there were some project activities not tracked by specific indicators. For instance, there were no indicators for the activity of the PPP project planning chain and the establishment of a computerized database of public investment projects.

b. M&E Implementation

The M&E arrangements were adequate. This facilitated data collection required for monitoring outcomes. M&E data helped inform decision-making, such as the mitigation of delays related to the COVID-19 pandemic. The detailed view of implementation progress of activities and disbursements, allowed a second restructuring to enable the part utilization of undisbursed funds.

c. M&E Utilization

The M&E data was used for monitoring project performance. The data was used by the government for making policy decisions and by the Bank for project restructuring purposes.

In sum, overall M&E is rated as substantial, in view of the minor shortcomings in the M&E framework.

M&E Quality Rating

Substantial

10. Other Issues

a. Safeguards

Environmental and Social Safeguards: The project was classified under Category C (no assessment project) under the World Bank safeguard policies at appraisal, as it did not include any activities that involved environmental or social risks. No safeguard policies were triggered during implementation.

b. Fiduciary Compliance

Financial management. The Bank conducted a financial management assessment at appraisal. The assessment concluded that the financial management arrangements of the PCU met the Bank’s minimum requirements. At appraisal, the PAD assessed fiduciary risks as Substantia, given the fragile country context. The project complied with the financing agreement covenants and Financial Management was consistently rated as Satisfactory during implementation (ICR, para 83-84).

Procurement. The PCU had knowledgeable staff. Although there were prolonged delays linked to the contracting procedures in the initial years, these were rectified. The procurement performance was rated as Satisfactory (ICR, para 84). There was no reported case of mis-procurement.

c. Unintended impacts (Positive or Negative)

There were no unintended impacts.

d. Other

Not applicable.

11. Ratings

Ratings	ICR	IEG	Reason for Disagreements/Comment
Outcome	Satisfactory	Satisfactory	
Bank Performance	Satisfactory	Satisfactory	
Quality of M&E	Substantial	Substantial	
Quality of ICR	---	Substantial	

12. Lessons

The ICR draws the following three main lessons from the experience of implementing this project, with some adaptation of language.

1. A well-defined project design, driven by robust analytical underpinnings, and understanding of political dynamics may raise the potential for success even in fragile environments. The project design reflected the Government's priorities. The analytical underpinnings formed the basis for establishing clear and measurable goals. This ensured Government commitment and cooperation with other development stakeholders.

2. Proper sequencing of reforms in Public Financial Management (PFM) initiatives may help in addressing downstream complexities in fragile settings with low initial benchmarks. The project prioritized laying the groundwork for PFM enhancements effectively, recognizing Togo's low initial benchmarks and its status as a fragile country at appraisal.

3. Achieving and attributing service delivery improvements within the timeframes of individual Governance operations can be challenging. Although the project supported activities with solid rationale, their discrete nature hindered establishing a direct link to enhancing service delivery.

13. Assessment Recommended?

No

14. Comments on Quality of ICR

The ICR presented a clear, coherent and well organized narrative of the project. The theory of change articulated in the text clearly shows the causal links between project activities, outputs and the intended outcomes which were quantifiable. The analysis discussed in the text provides sufficient evidence for assessing project performance. The text adheres to the ICR guidelines and methodology. The ICR draws reasonably good lessons from the experience of implementing this project. The lessons logically flow from the data and analysis provided in the ICR.

There were minor shortcomings. There is a discrepancy between the rating for overall efficacy. While overall efficacy was rated as High on page 15 in the ICR (para 52), in the Executive Summary (page v), overall efficacy is rated as Substantial. The overall length of the main body of the text at 25 pages is considerably more than the recommended length of 15 pages. The ICR would have benefitted by better editing.

a. Quality of ICR Rating

Substantial