

QUARTERLY MANAGEMENT REPORT

INVESTMENT WINDOW

REPORTING PERIOD: JULY TO SEPTEMBER 2021

APRIL 2022



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ACRONYMS AND ABBREVIATIONS

AFN	Afghani(s) (currency)
ARAP	Afghanistan Rural Access Project
ARTF	Afghanistan Reconstruction Trust Fund
CASA CSP	Central Asia-South Asia Community Support Program
CCAP	Citizen’s Charter Afghanistan Project
CCNP	Citizen’s Charter National Priority Program
CDC(s)	Community Development Council(s)
CDP	Community Development Plan
CIP	Cities Investment Program
CPM/GHM	Community Participatory Monitoring/Grievance Handling Mechanism Sub-Committee
EQRA	Education Quality Reform in Afghanistan
ESS	Environmental and Social Safeguards
EZ-Kar	Eshteghal Zaiee - Karmondena
GHC	Grievance Handling Committee
GRM	Grievance Redress Mechanism
HRM	Human Resource Management
ICA	Internal Control Assessment
IDLG	Independent Directorate of Local Governance
IRDP	Irrigation Restoration and Development Project
MIS	Management Information System
MoPW	Ministry of Public Works
MRRD	Ministry of Rural Rehabilitation and Development
O&M	Operations and Maintenance
PIU	Project Implementation Unit
PMU(s)	Project Management Unit(s)
PPE	Personal Protective Equipment
REACH	Relief Activities for Afghan Communities and Household Project
SMS	School Management Shura
SoE(s)	Statement(s) of Expenditure
TAGHIR	Tackling Afghanistan’s Government HRM and Institutional Reforms
THRCP	Trans-Hindukush Road Connectivity Project
TPMA	Third-Party Monitoring Agent
USD	United States Dollar(s) (currency)
WBA	Well-Being Analysis

1 OVERVIEW OF ACTIVITIES AND KEY FINDINGS

This report presents findings from the physical and financial monitoring of World Bank-funded investment projects in Afghanistan for the period July to September 2021 (Q3 2021). During this period, project implementation and monitoring continued up until 15 August until they were paused due to the events caused by the fall of the Afghan Government and subsequent Taliban takeover. As a result, the Q3 2021 reporting period only covers data collected until 15 August. Therefore, this report covers a smaller number of sub-projects than the previous quarterly report.

BOX 1

References to “the Government” in this report refer to the former Government of the Islamic Republic of Afghanistan.

References to “project monitoring” in this report refer to field monitoring activities undertaken prior to the pause of project disbursements on 15 August 2021.

While project monitoring was suspended on 15 August, financial monitoring activities continued remotely, without direct interaction with line ministries and project teams, and with limited access to documentation. Remote financial monitoring activities included securing project documentation, developing new tools to review expected activities, and facilitating partnerships through direct engagement of stakeholders.

BOX 2

Despite the pause in regular project monitoring site visits from 15 August, we continued to conduct informal data collection between 18 and 22 August. This involved informal phone outreach with a focus on service delivery using a non-standardized questionnaire, as well as field researchers’ observations. Outreach was conducted with civil servants and Project Implementation Units, with some limited outreach to Taliban members.

This summary section provides an overview of our approach to monitoring activities and key findings for the quarter. It is followed by more detailed overviews of project-specific findings in the section ‘Results from Physical Monitoring’.

1.1 PHYSICAL MONITORING

Our physical monitoring activities are conducted based on requests from World Bank project teams. In Q3, we monitored six investment projects, undertaking 726¹ site visits to 29 of 34 provinces and interviewing 4,066 respondents, 11 percent of whom (453) were women. For these visits, the provinces not visited were Jawzjan, Nuristan, Paktia, Samangan and Takhar, usually because of local insecurity. Government engineers and project staff accompanied us for 582 site visits to six projects: the Central Asia-South Asia Community Support Program (CASA CSP), the Cities Investment Program (CIP), the Citizens' Charter Afghanistan Project (CCAP), Education Quality Reform in Afghanistan (EQRA), the Irrigation Restoration and Development Project (IRDP), and the Trans-Hindukush Road Connectivity Project (THRCP).

In this reporting period, the IRDP Task Team requested that we conduct a final assessment of the project to support the Implementation Completion and Results Report. However, we were only able to conduct one site visit prior to the fall of the Government, so our findings are not included in this report.

In Q3, we continued to revise and refine data collection tools in partnership with World Bank and Government partner teams to address any remaining gaps and remove outdated questions. For questions where knowledge or incentives might vary between respondent types, we sought to identify areas of consensus, where all respondents in a community gave the same response to questions.

In this period, we continued the monitoring of the Citizens' Charter National Priority Program (CCNP) COVID-19 Relief effort begun in Q1. We expanded our monitoring to include areas covered by the Relief Effort for Afghan Communities and Household Project (REACH) project and Kabul Municipality, which, together with the CCNP COVID-19 relief effort, fell under the Government's Dastarkhan-E-Milli COVID-19 emergency relief program. In Q3, we undertook 773 site visits in 20 provinces.

Throughout Q3, our monitoring approach continued to reflect limitations imposed by both the COVID-19 pandemic and changing security situation. Figure 1 presents our physical monitoring activities by number of visits to provinces, sub-projects, and Community Development Councils (CDCs).

Figure 2 illustrates the distribution of site visits, and identifies the number of communities or locations visited, as well as the number of sub-projects assessed.²

¹ This total includes all visits, including any multiple visits. In Q3, there were 5 multiple visits to THRCP road sections.

² Sub-projects are activities undertaken at local level. Communities may undertake more than one sub-project at the same time as part of the same project (under CCAP, for example, one CDC may undertake a water supply sub-project and canal rehabilitation sub-project).

Figure 1: Map of TPM Activities in Q3 2021

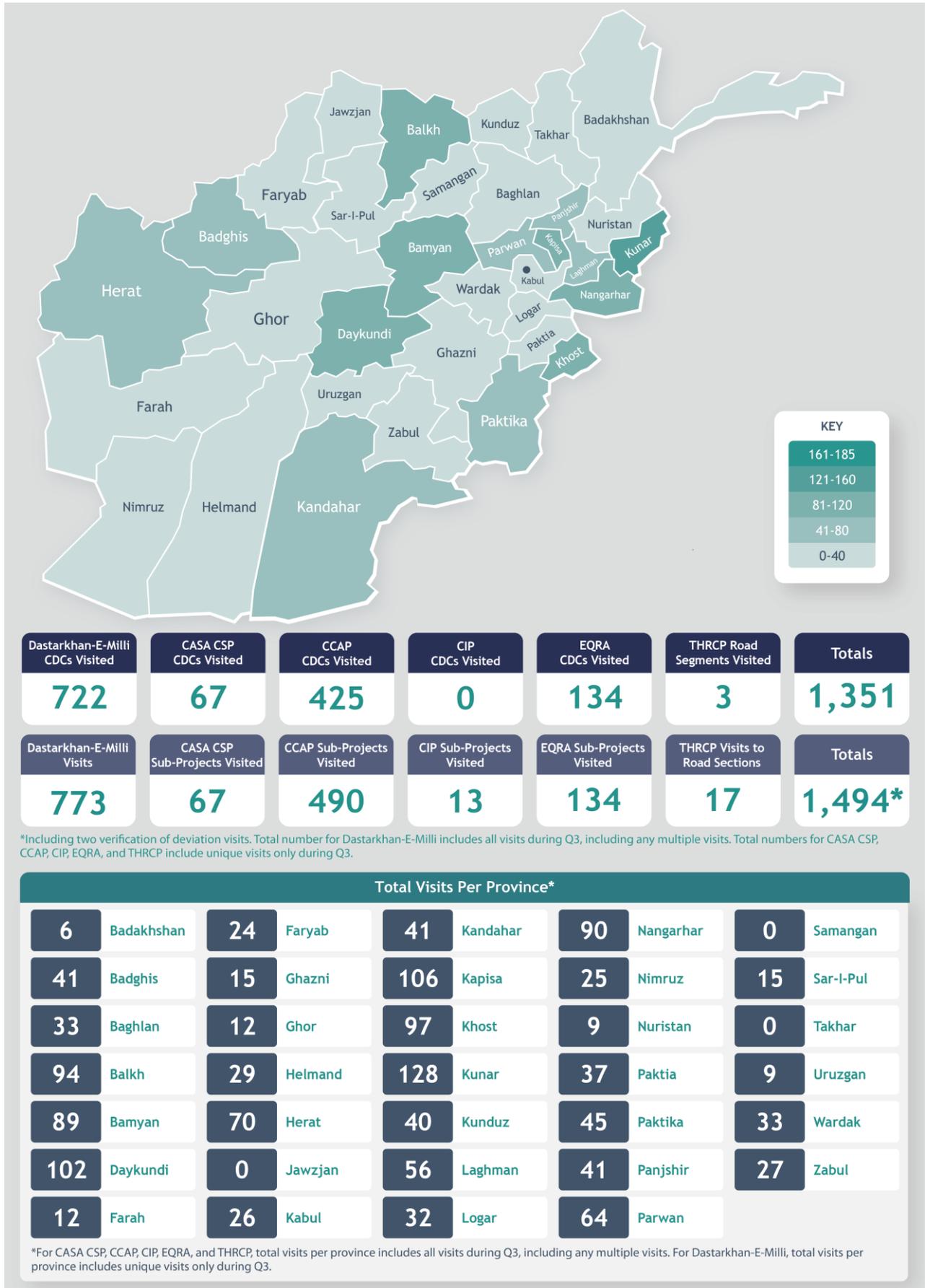
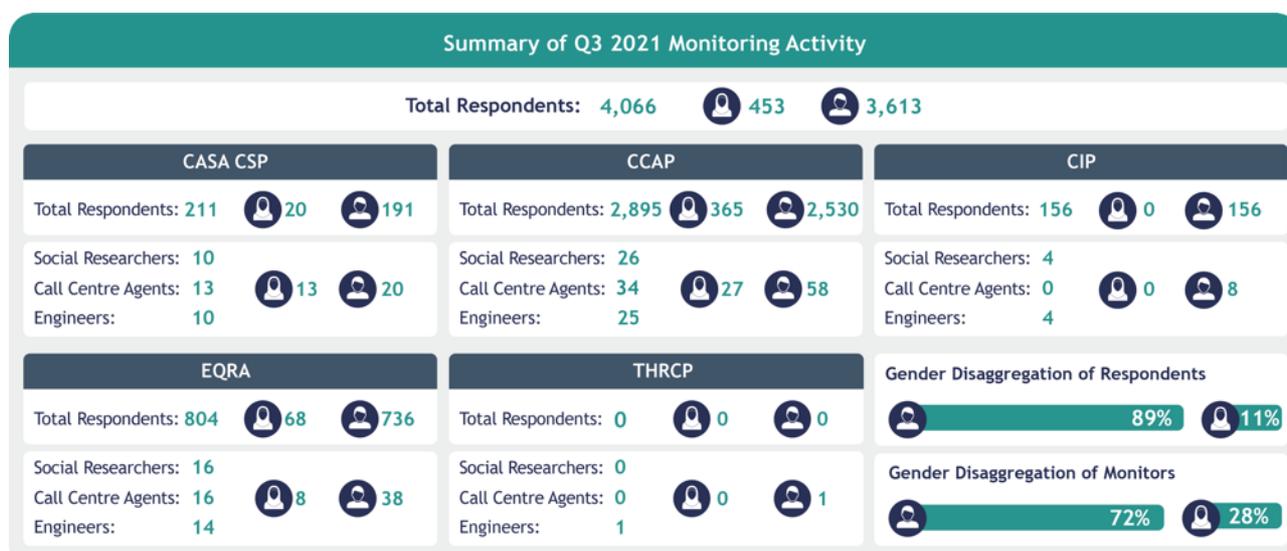


Figure 2: TPM Q3 2021 Interviews for Investment Projects



The following sections provide an overview of our approach to and key findings from physical monitoring activities of non-COVID-19 relief projects.

1.1.1 Project Scores and Ratings

We score and provide a rating for each sub-project using the system shown in Annex 1. The scores are based primarily on engineers’ assessments of infrastructure, including the quality of design, materials used, and workmanship. In the case of completed or near-completed work, the likely effectiveness of any Operations and Maintenance (O&M) Plan is also assessed. These scores are then adjusted to account for the number and severity of any unauthorized changes, shortcomings, or faults found (referred to as ‘deviations’ in our reporting).

These adjusted scores for individual sub-projects are then converted into ratings, from Very Good to Very Poor, and aggregated to produce a project rating. Table 1 below provides overall project ratings. Detailed findings for each project can be found in the section ‘Results from Physical Monitoring’.

Table 1: Project Ratings in Q3 2021

PROJECT	RATING
CASA CSP	Good
CCAP	Good
CIP	Good
EQRA	Good
THRCP	Average

1.1.2 Deviations

In conducting site visits, our engineers assess infrastructure progress and the quality of work undertaken, recorded in the form of ‘Observations’. Some of these are reported as ‘deviations’, classed as Critical,

Major, or Minor. In short, a Critical deviation is one which, if not rectified, could lead to injury or death for current workers or future users or to failure of the sub-project as a whole; a Major deviation is one that is not life-threatening but affects the structural integrity or overall sustainability of the sub-project; a Minor deviation is often a cosmetic deviation not affecting structural integrity, usability, or sustainability. Minor deviations can often be corrected with little effort and at limited cost. See Annex 1 for details.

For each deviation, our engineers make an on-site estimate of the cost of rectification, which is then reviewed for quality by the Financial Monitoring team. These estimates are not based on a market exercise for the local or transported cost of labor and materials but are provided to help project teams and Government partners make informed decisions about how to rectify deviations; they should not therefore be interpreted as a final determination of value.

Table 2: Deviations Identified in Q3 2021

	OBSERVATIONS	CRITICAL	MAJOR	MINOR	TOTAL DEVIATIONS	DEVIATIONS AS % OF TOTAL OBSERVATIONS	ESTIMATED COST OF RECTIFICATION (USD)
CASA CSP	959	1	6	1	8	1%	2,510
CCAP	13,717	9	166	124	299	2%	124,614
CIP	410	0	0	0	0	0%	0
EQRA	4,151	6	107	125	238	6%	103,233
THRCP	330	2	35	10	47	14%	20,520
	19,567	18	314	260	592	3%	250,877

The deviations listed above are those that were identified during site visits between 21 July 2021 and 15 August 2021. Before 15 August 2021, project teams and Government partners were notified of all deviations via an online reporting platform allowing them to be allocated to provincial project teams for rectification. Additionally, we held regular meetings with project teams from implementing ministries to follow up on actions taken. The change in administration on 15 August 2021 brought this process to a halt. We explain the implications of this on our work in greater detail in Section 4.

As agreed with the World Bank and project teams, Minor deviations with an estimated rectification cost of under USD 50 are classified as 'Notifications'. Table 3 below provides an overview of Notifications identified during Q3 2021.

Table 3: Q3 2021 Notifications

PROJECT	NOTIFICATIONS	NOTIFICATIONS AS %AGE OF OBSERVATIONS
CASA CSP	10	1%
CCAP	394	3%
CIP	5	1%
EQRA	202	5%
THRCP	0	0%
	611	3%

1.1.3 Rectifications of Deviations

In Q3 2021, a total of 381 deviations (13 Critical, 163 Major, and 205 Minor) were reported as rectified by Government partners compared to 840 deviations (19 Critical, 343 Major, and 478 Minor) in Q2 2021, the decrease reflecting the reduced reporting period and increased insecurity. As of 15 August 2021, there were a total of 3,099 open deviations (91 Critical, 1,558 Major, and 1,450 Minor), some dating back to 2020 and a limited number of ‘legacy’ deviations from now-closed projects. See Annex 2 for details. Government partners recorded rectifications made up until 15 August 2021 on the online reporting platform. Following the fall of the Government, we agreed with the World Bank to remove Government partners’ access to the online reporting platform for their safety and for information security. As a result, any rectifications made after 15 August 2021 were not recorded on the online platform.

The section on ‘Results from Physical Monitoring’ shows all deviations identified in Q3 by project and their status as of 15 August 2021.

1.1.4 Good Practice and Extra Works

In Q3, adjustments were made to separate evidence of Good Practice, or individual elements of work undertaken to a high standard, from that of Extra Works, which are additional tasks undertaken to an appropriate standard at no additional time or cost to the project. These changes are intended to reflect the fact that some communities can mobilize resources to undertake work beyond the scope of the original contract or design. In Q3, we identified 16 examples of Good Practice, all from CCAP, and 30 examples of Extra Works from CCAP and EQRA.

Table 4: Examples of Good Practice in Q3 2021

PROJECT	NO.	DETAILS
CCAP	16	Examples included the construction of a fence to prevent theft or people from wandering into dangerous areas, and a protection or retaining wall to reduce the vulnerability of the sub-project to natural disasters.
	16	

Table 5: Examples of Extra Works in Q3 2021

PROJECT	NO.	DETAILS
CCAP	18	Examples included building more or larger water reservoirs than planned and building longer canals than planned.
EQRA	12	Examples included additional or enhanced work, such as upgrading local toilets to flush toilets, extending water facilities, and extending protective walls.
	30	

1.1.5 Ad Hoc Monitoring

In Q3, we undertook ad hoc monitoring tasks at the request of the Ministry of Public Health and World Bank Sehatmandi project team.

Table 6: Ad Hoc Monitoring in Q3 2021

PROJECT / TASK	RESULTS
Ministry of Public Health WHO/UNICEF Contract Performance Review	At the request of the Ministry of Public Health, we undertook meetings with WHO and UNICEF to confirm the scope of the task and began a review of documents received in July 2021. Work on this was halted in August 2021; a final report is due in Q4 2021.
Verification of COVID-19 Supplies	We conducted two verifications of supplies to UNICEF to be distributed in coordination with the Ministry in July and August 2021.

1.2 MONITORING COVID-19 RELIEF EFFORTS

This quarter, we continued monitoring the implementation of the ‘Dastarkhan-E-Milli’ COVID-19 emergency relief program to review compliance with agreed procedures and protocols during the beneficiary selection, procurement, and distribution processes. We monitored all phases of the program, including pre-distribution, distribution, and post-distribution. We also identified and investigated major irregularities across all three phases and reported them as either Red Flag Notices or Alert Notices.³

³ The following thresholds are used to identify Red Flag Notices and Alert Notices:

Alert Notices:

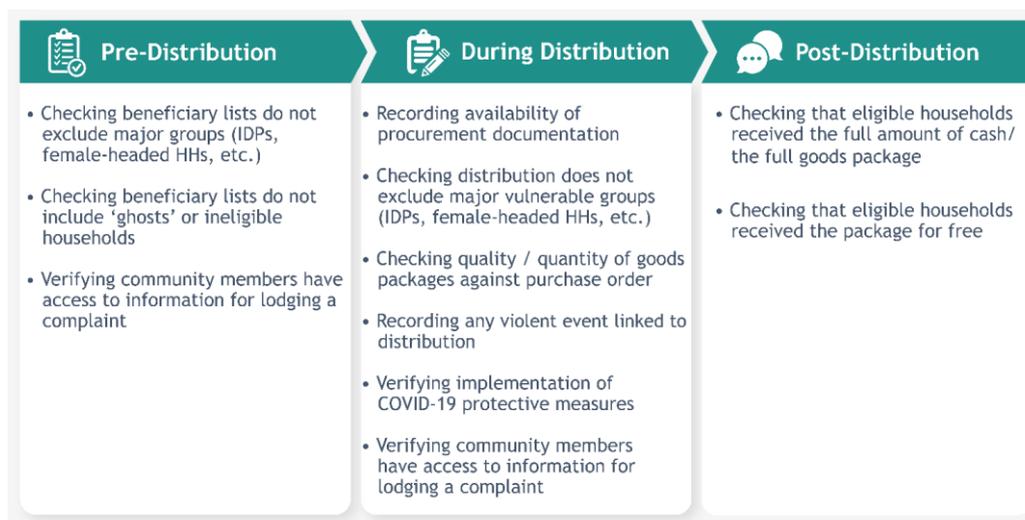
- Eligible beneficiary exclusion: ≥ 10 percent and at least one newly arrived household is not included.
- Ineligible beneficiary inclusion: ≥ 10 percent.

Red Flags:

- Non-application (or use) of COVID-19 protective measures: < 50 percent.
- Evidence of relief package diversion: lower quantity of goods or cash than purchase order/guidelines, verified by call backs.
- Procurement procedures not followed: forms missing/contradicting each other.
- Civil unrest: evidence of physical violence or threats or robbery linked to distribution.

Red Flag Notices, such as fund diversion or civil unrest resulting from the distribution, normally require immediate action, while Alert Notices may require a less urgent programmatic response from the Government.

The monitoring objectives for the three phases of the project comprise the following:



1.2.1 Methodology

For each phase of monitoring, we used a mixed-methods approach to triangulate results from both quantitative and qualitative data collection. Our methods included key informant interviews, direct observations of distributions, door-to-door surveys, and taking photographs on site. Where our monitoring identified major irregularities, findings were verified by making follow-up phone calls with multiple community members.

After the end of the first quarter, the methodology was modified and data collection tools were refined, based on lessons learned and feedback from project teams, to ensure we continued to increase the accuracy and reliability of the data collected.

For each phase of monitoring, we broadened the scope of field officers' checks as shown below.

Pre-distribution

- Detailing the total number of CDCs with exclusions or unverifiable households through checking Form 1 (the approved beneficiary list) against responses from key informants involved in the listing process, as well as observations made during distribution, to verify whether all eligible households were included in the beneficiary lists.
- For Alert Notices reporting exclusions of ten percent or more, verification was based on three sources of information: at least two key informants reporting exclusion stated in Form 1; at least ten percent of eligible households interviewed through door-to-door visits not found on the list reported in Form 2; and confirmation through call-backs that the process did not include all eligible households with details about the reasons for the exclusions.
- To verify that listed households exist, we conducted door-to-door surveys to verify all households on the beneficiary list could be found. In election units with at least ten percent of names on the

list not found, we interviewed key informants to confirm the names were unknown in the community or have left.

Distribution monitoring

- Additional information was recorded using an updated direct observation tool and this was supplemented by on-site photographs and key informant interviews.
- For all processes, including COVID-19 protection measures, the quality and quantity of packages, and the existence of procurement documents each team member took multiple photos that were analyzed by data clerks in Kabul.

1.2.2 Pre-distribution Monitoring

For Q3, we monitored 189 CDCs during the pre-distribution phase. During this phase we interviewed CDC leaders involved in the drafting of the beneficiary lists, planning, and procurement to gather information on the procedures followed. We also interviewed community members from between three and eight election units to triangulate information on the beneficiary selection process. Key findings included:

- Overall, the program implemented an inclusive beneficiary listing process that ensured most households were listed to receive assistance. Almost all households visited door-to-door were found to be included in the beneficiary lists: 30,242 out of 30,919 (98 percent). Of key informants directly involved in listing beneficiaries in their CDCs (227 out of 599), most reported that there had been no issues or challenges with the process (90 percent, 205 out of 227). Notably, this represents almost half of all CDCs where there were no reports of challenges (45 percent, 85 out of 189 CDCs).
- To ensure all eligible households were included in beneficiary lists, CDCs were required to update their community profiles in the summer of 2020 to include all newly arrived or newly established households, and just under half of all CDCs had done so (86 out of 189, 46 percent). Of these, 28 percent (53 out of 189 CDCs) had updated their community profiles for a second time in 2021 to include newly arrived or created households. The provinces with the highest number of CDCs that had not updated their community profiles were Bamyan (29 out of 42 CDCs, 69 percent), Khost (15 CDCs out of 24, 63 percent), and Daykundi (13 CDCs out of 43, 30 percent).
- Overall, in Q3 the wrongful inclusion of households in beneficiary lists was not a major issue, with only 24 key informants reporting households being wrongfully included. This represents a total of 307 households from five out of 189 CDCs.
- Unverifiable household numbers were also low in Q3. During door-to-door surveys, only one percent (359 out of 36,893) of household names in the beneficiary lists were not recognised by anyone in the community.

- In all, 71 households surveyed out of 30,919 (0.2 percent) from eight out of 189 CDCs reported having paid cash or in-kind to be added to beneficiary lists.
- Throughout Q3, there was very limited awareness of the availability of the Grievance Redress Mechanism (GRM) amongst community members during the pre-distribution phase, with only 11 percent of community members (3,420 out of 30,919) reporting knowing how to lodge a complaint about the listing process. To triangulate these findings, key informants from the CDC were asked if they were aware of any serious complaints having been raised by community members about the beneficiary list. In all, only 12 percent of CDCs (22 out of 189) had key informants reporting awareness of complaints made to the CDC about the beneficiary listing process.⁴

1.2.3 Distribution Monitoring

We visited 584 CDCs to conduct direct observations of distributions. Findings from our monitoring of distribution activities draw from direct observations, on-site photographs, and key informant interviews.

- Generally, households received equal quantities of items in packages across all CDCs. Most followed Operations Manual guidelines on package composition. Only 30 of 584 (five percent) of CDCs distributed some packages with no source of protein (such as beans, peas, or lentils). Six out of 584 CDCs (one percent) did not include soap. These absences may reflect limited local availability in some areas.
- While the packages distributed were of good quality overall, just over a quarter of CDCs (27 percent, 160 out of 584) distributed items with visible defects (such as damaged packaging, expired or contaminated items, partially empty bags or bottles, or missing items), found mainly in Khost (50 percent, 19 out of 38 CDCs), Nimruz (46 percent, six out of 13 CDCs), and Kapisa (34 percent, 28 out of 83 CDCs).
- Throughout Q3, low adherence to COVID-19 protective measures continued: only 40 percent of CDC distribution team members (231 out of 584 CDCs) were seen wearing masks as they distributed assistance, a significant drop compared to Q2 (59 percent, 520 out of 878 CDCs). Even fewer CDCs provided handwashing stations or hand sanitizers (7 percent, 41 out of 584 CDCs). Only eight out of 584 CDCs were observed to be enforcing social distancing.
- The program prioritized the distribution of assistance to female-headed households. By adapting the program design to consider social norms, the program ensured women's safety and delivered assistance door-to-door instead of at distribution sites. As a result, based on door-to-door household surveys, almost all female-headed households visited received assistance (99 percent, 4,068 out of 4,099).

⁴ In cases where key informants from the same CDC provided different responses, awareness of a complaint was counted in a CDC if it was reported by two or more key informants.

- The other vulnerable households were able to receive their assistance successfully. There were four other types of vulnerable households as categorized by the program: households headed by a person with a disability, households headed by a person 65 or over, newly arrived IDPs, and recently returned households.
- Almost all households headed by a person with a disability that were listed were observed to have received assistance (96 percent, 1,747 out of 1,813).
- 95 percent of IDP households included in the beneficiary lists were also observed to have received their packages (8,050 out of 8,473). Similarly, 91 percent of households headed by a person aged 65 or over listed received assistance (91 percent, 6,134 out of 6,712) and 73 percent of returnee households received their assistance packages (1,198 out of 1,622).
- Efforts were made to promote accessibility for women to the distribution sites. Almost one quarter (22 percent) of CDCs (131 out of 584) included at least one female staff member in distribution teams. This is slightly less than in Q2, where 29 percent of CDCs included female staff members (257 out of 878).
- Overall, the visibility of information on GRMs did not improve throughout the program, with only 31 percent of the CDCs visited (180 out of 584) observed to be displaying information on GRMs on posters or banners, a decrease from 51 percent in Q2 (450 out of 878).
- Few beneficiaries were observed to be making payments to receive assistance, noted in only six percent of CDCs (32 out of 584) during distribution. Reasons for this included CDCs requiring payment to cover the cost of the transportation of goods, distribution team members' lunches, or additional packages for households that were left out of the distribution.

1.2.4 Red Flag and Alert Notices

To immediately report programmatic irregularities to the World Bank project team and Government partners, we issued Red Flag and Alert Notices on a weekly basis for Government investigation and follow-up. Red Flag Notices were used to report five types of irregularities: cash or goods diversion, civil unrest, lack of COVID-19 protective measures, procurement failures, and the inclusion of unverifiable households in the beneficiary list. We issued Alert Notices for cases of exclusion of potentially eligible households and inclusion of ineligible ones (the last category added after discussion with the World Bank to ensure high numbers of unverifiable households were reported, particularly evidenced in Kabul Municipality). A Red Flag Notice or Alert Notice was issued for each irregularity and multiple reports could be issued for one CDC.

In Q3, we issued 90 Red Flag Notices⁵ and 57 Alert Notices⁶ for cases of substantiated irregularities⁶

⁵ Including Notices issued involving follow-up investigation.

⁶ This number refers to Red Flag and Alert Notices with events occurring in the reporting period, not those shared with the World Bank in the reporting period.

occurring in the jurisdiction of the three implementing agencies: the Ministry of Rural Rehabilitation and Development (MRRD), the Independent Directorate of Local Governance (IDLG), and Kabul Municipality.

Procurement failures were the most common source of Red Flag Notices, with 30 instances found. Lack of enforcement of COVID-19 protective measures made up the second largest portion of Red Flag Notices (23) followed by cash or goods diversion (16). The presence of wrongfully included households led to 15 Red Flag Notices. Civil unrest associated with the distribution process was reported in six instances, most taking the form of arguments or short-lived scuffles involving those who had been excluded from the beneficiary list. None resulted in serious injury or fatalities.

Procurement-related Red Flag Notices were issued because of goods distributed being of low quality (21 instances), damaged packaging (especially for flour, reported in five instances), or an item was date-expired (four instances). Field researchers took photographs of these issues at the distribution site.

Most of the 23 instances where COVID-19 protective measures were not followed were found in Kandahar province (10 cases), followed by three cases each in Balkh and Paktika. In Kapisa, Kunar, and Laghman, two cases each were reported, with one instance from Parwan province. Six instances came from areas administered by IDLG, the remaining 17 in MRRD areas. These were also evidenced by photographs taken at the distribution point.

In all, 15 of the 16 reported cases of fund diversion related to beneficiaries being asked to pay a sum of money to cover different costs. In nine reported instances, they were asked to pay a fee of between AFN 20 and 860 (per beneficiary) to receive aid packages, with transportation costs given as the reason why payments were sought. In four instances, it was stated that money had been collected to pay for the lunch of distribution workers, and in three cases, beneficiaries paid to purchase additional packages for households who otherwise would not receive any assistance. In one CDC, the reason was unknown.

Ten cases of unverifiable households being included in the beneficiary list were reported in Kabul Municipality, four in IDLG areas, and one case in an MRRD area. In all cases, key community members were not able to identify names registered on the beneficiary list. Additionally, in eight cases, wrongfully listed beneficiaries had moved away since the beneficiary list was finalized.

Table 7: Red Flags in Q3 2021

RED FLAGS BY CATEGORY	NUMBER
Cash or Goods Diversion	16
COVID-19 Protective Measures not enforced	23
Procurement Failures	30
Riots of Civil Unrest	6
Unverifiable Households	15
	90

No Red Flag Notices were issued in Q3 relating to pre-distribution, with eight Alert Notices issued regarding the exclusion of potentially eligible households.⁷ Six of these were reported in REACH areas, while one each was found in IDLG and Kabul Municipality CDCs.

In five of the eight Alert Notices issued, the reason for exclusion of potentially eligible beneficiaries was that the households reportedly arrived after the listing process was finished. In two cases, outdated household listings were used as the basis of the beneficiary lists instead of an up-to-date community profile. Lastly, in Gardez district in Paktiya province, CDC representatives reportedly stated that IDPs were not included because they did not visit the CDC office to be listed.

There were 49 Alert Notices issued for wrongful inclusion, all in Kabul Municipality. These were because multiple beneficiaries living in the same dwelling and sharing the same kitchen had been wrongfully included in the lists.

The preparation of the beneficiary lists in Kabul Municipality was inadequate. Through two phases of monitoring conducting during Q2 we found that the municipality had not implemented the beneficiary listing process in line with the Operations Manual, with checks of the beneficiary lists providing the World Bank with a mechanism for accountability. As a result, distribution in Kabul was put on hold.

Table 8: Alert Notices in Q3 2021

ALERT NOTICES BY CATEGORY	NUMBER
Household Exclusion	8
Wrongful Household Inclusion	49
	57

1.3 FINANCIAL MONITORING

While our physical monitoring activities are conducted in response to project management needs, our financial monitoring activities cover all active World Bank-funded projects. Our activities include Internal Control Assessments (ICAs), which take place six months after the start of project implementation and include annual follow-up of action plans developed to address any weaknesses identified. We also routinely review periodic Statements of Expenditure (SoEs) submitted by all project teams for disbursements by the World Bank. For infrastructure projects with physical monitoring activities, we provide financial reviews of data collected during in-person site visits.

1.3.1 Internal Controls Assessments

ICAs evaluate the adequacy and effectiveness of investment projects' governance, risk management, and control processes intended to ensure the effective management of Afghanistan Reconstruction Trust Fund

⁷ An Alert Notice for exclusion is issued when 10 percent or more of potentially eligible households in the community are not included on the beneficiary list.

(ARTF) and International Development Association project funds. They include, but are not limited to, reviews of significant processes related to financial management, procurement, recruitment and Human Resource Management (HRM), and governance and control environment.

The status of the ICAs that were being completed or conducted during Q3 is shown in the table below.

Table 9: ICAs in Q3 2021

PROJECT	STATUS
Afghanistan Gas Project (AGASP)	Interim report without management feedback to be issued in 2022, as our assessment was ongoing on 15 August and could not be completed after.
Afghanistan Land Administration Project (ALASP)	No report to be issued as field work had just commenced by 15 August 2021.
CASA Community Support Project (CASA CSP)	Final report without management responses to be issued in 2022, as this could not be obtained by 15 August.
Cities Investment Program (CIP)	Interim report without management feedback to be issued in 2022, as our assessment was ongoing on 15 August and could not be completed after.
Eshteghal Zaiee - Karmondena (EZ-Kar) - Kabul municipality	In reporting phase; final report with management responses to be issued in 2022.
Tackling Afghanistan’s Government HRM and Institutional Reforms Project (TAGHIR)	Completed in Q3 2021.

The main findings from the TAGHIR ICA are discussed below in Section 3.2.

1.3.2 Statements of Expenditure

For Statement of Expenditure (SoEs, our intention is to assist the World Bank in verifying that project expenditure is eligible for disbursement under the relevant Grant or Financing Agreements. This process is a supplemental control measure introduced by the World Bank uniquely in Afghanistan as one element of the ARTF Enhanced Fiduciary Control Framework.

For each SoE, we review project procurement, payroll, and project implementation and management expenditure. We conduct sample-based substantive testing of transactions through multiple rounds of review, requests for documentation or clarifications, and responses from project teams to allow for corrective action. After each review, we submit SoE Cover Letters to the World Bank outlining findings and their impact on the amounts claimed for replenishment.

Through this process, we identify Questionable Transactions, or financial errors impacting the expenditure reported. These primarily arise as a result of:

- Missing supporting documentation
- Non-compliance with applicable procurement regulations
- Overdue Advances claimed as expenditure
- Non-compliance with financial policies

- Accounting/Casting errors
- Overpayments to contractors and employees

To minimize the risk of ineligible expenditure, payments identified as Questionable Transactions are withheld until issues are resolved and missing documentation provided.

In Q3, we issued 35 SoE cover letters for projects that had reported expenditure of USD 99,132,722, proposing adjustments for Questionable Transactions amounting to USD 146,477. Our SoE reviews are further discussed in Section 3.1.

1.3.3 Misalignment Between Physical and Financial Progress

For infrastructure sub-projects where we conduct physical monitoring activities, we also undertake a financial review to assess whether financial records align with physical progress made, are properly documented, or meet other monitoring criteria.

We analyze expenditure incurred by each sub-project as of the date of the site visit and calculate the difference between the funds paid out for an individual contract and engineers' estimates of physical progress. Where the financial progress for a sub-project exceeds physical progress by 35 percent or more (save for EQRA where the figure applied is 15 percent), we flag this for the project team review and follow up if needed. It is important to note that such differences can be a legitimate product of contractual arrangements, may relate to materials purchased but not yet used, or could be a product of other non-problematic factors. In Q3 2021, we identified misalignment between physical and financial progress in five sub-projects under CCAP and EQRA, totaling USD 41,294.

Table 10: Instances of Misalignment between Physical and Financial Progress Identified in Q3 2021

PROJECT	NO.	VALUE (USD)
CCAP	2	7,749
EQRA	3	33,545
	5	41,294

1.3.4 Planned Financial Monitoring for Q4 2021

Remote financial monitoring for Q4 was planned to focus on the following:

- Support for project closure through the processing of projects' final SoEs for the period up to 15 August 2021, including validating any unpaid liabilities and commitments.
- Service Provider Invoice Validation, reviewing and validating invoices submitted by Service Providers for the provision of the Basic Package of Health Services and the Essential Package of Hospital Services under the Sehatmandi and COVID-19 Emergency Response and Health Systems Preparedness Project (COVID-19 ERHSPP) prior to 15 August 2021.

1.4 LIMITATIONS

1.4.1 COVID-19

In Q3, we continued to operate under a COVID-19 Contingency Plan shared with the World Bank and reviewed on a regular basis. Under this plan, to reduce the potential for infection involving our own staff or those with whom we came into contact, we continued to replace face-to-face individual and group interviews wherever possible by telephone calls, based on information received from community members and our own local contacts.

COVID-19 also impacted our ability to engage directly with Government counterparts, primarily for the purposes of obtaining project procurement documentation. This sometimes resulted in delays in processing of SoEs. We were also unable to conduct in-person capacity development activities with Government staff, especially at the Ministry of Finance.

1.4.2 Access to Female Respondents

Throughout this period, our ability to interact with women respondents was constrained by the need to conduct remote phone-based interviews rather than face-to-face interviews or group discussions. Limited telecommunications access and electricity to recharge mobile phones in more remote areas affected our ability to conduct interviews with both men and women. However, since male household members tend to control women's telephone access and use, remote calling reduced the number of women we were able to interview, even when using female call center staff. This affected the overall percentage of female respondents, particularly for women who were not CDC office-bearers or sub-committee members.

The impact of this on our findings relates to the percentage of women we could interview in any one community. While a random sample of women nationwide can, statistically, provide a broad basis for reporting, a much higher sample is required to provide evidence from a specific community or group of communities. The effect of not being able to directly engage with as many women as before makes our findings somewhat less representative in terms of comparing findings between men and women. However, it does not make our findings less representative in terms of reporting community voices overall.

1.4.3 Access to Sub-Project Sites

During Q3, we conducted site visits in 29 out of 34 provinces. We continued to monitor threats and planned our activities in response to emerging security issues, including in hard-to-reach areas. Following the collapse of the Government, monitoring stopped on 15 August. As a result of this, and due to continued local insecurity in the first half of Q3, we were unable to conduct data collection as planned in 211 sites (49 for CASA CSP, 126 for CCAP, one for CIP, 29 for EQRA, and six stations for THRCIP).

1.4.4 Program Management Unit Responses

As previously reported, Program Management Units (PMUs) for the ‘Dastarkhan-E-Milli’ COVID-19 emergency relief program were not always able to share implementation plans in advance. On several occasions, our staff were informed by a PMU that distribution was not taking place but learned through community contacts that it had in fact occurred. Other distributions were conducted without being included in implementation plans and which our staff were therefore unable to attend. To address these issues, regular meetings took place between our monitoring staff and implementing agency teams, with specific examples cited for the PMUs to follow up.

1.4.5 Verification of Beneficiary Lists

For the ‘Dastarkhan-E-Milli’ COVID-19 emergency relief program, we initially planned to obtain beneficiary lists (Form 1) from CDC office-bearers, but this was often not possible because CDC office-bearers do not always have the lists in their possession. Instead, therefore, we tended to draw information from Management Information System (MIS) forms, which are an abbreviated version of the hard copy beneficiary lists and contain less information compared to the original documents.⁸ Consequently, verifying the accuracy of beneficiary lists proved time consuming and did not allow a comprehensive verification of vulnerable households.

⁸ Hard copy beneficiary lists are usually handwritten and contain extensive detail while the MIS database was designed to collect only key information (beneficiary names and gender, but not status related to displacement or disability, for instance).

2 RESULTS FROM PHYSICAL MONITORING

Whether monitoring in person or by telephone, we assess both infrastructure and ‘soft components’, where applicable. ‘Soft components’ include social mobilization activities such as CDC elections, the formation of CDC sub-committees, and community participatory activities. The findings below cover infrastructure and soft components, and the application of Environmental and Social Safeguards.

2.1 DEVIATIONS

Despite intensified and escalating violence, project implementation and monitoring continued up until 15 August. In Q3, we identified 592 new deviations (18 Critical, 314 Major, and 260 Minor). None of the Critical deviations identified in Q3 were identified as non-rectifiable as of 15 August. Of the 65⁹ Critical deviations identified overall during the Q1 2021 to Q3 2021 period, three¹⁰ were identified as non-rectifiable as of 15 August.

In Q3, Government partners reported as fully rectified a total of 381 deviations (13 Critical, 163 Major, and 205 Minor). A further 246 deviations (15 Critical, 143 Major, and 88 Minor) were identified as non-rectifiable in this period. As of 15 August, there was a total of 40 open Critical deviations. Annex 2 provides an overview of the Critical, Major, and Minor deviations fully rectified in Q3.

Almost half of deviations (45 percent) identified this quarter were attributed to insufficient sub-project management, often involving a lack of advance planning or on-site supervision, including 12 of the 18 Critical deviations. Insufficient project management can also be seen as contributing to examples found of poor workmanship or use of sub-standard materials. O&M Plans, assessed only for completed or near-completed sub-projects, were often found to have insufficient community funds to enable them to be implemented.

Table 11: All Deviations Identified in Q3 2021 by Aspect

	CRITICAL	MAJOR	MINOR	TOTAL	%
Project Management	12	115	142	269	45%
Materials	1	35	71	107	18%
O&M	2	80	11	93	16%
Workmanship	0	28	22	50	8%
Social Safeguards	0	33	7	40	7%

⁹ Project breakdown of critical deviations identified in Q1-Q3: CCAP - 34; CIP - 1; EQRA - 27; THRC - 3.

¹⁰ Project breakdown of critical deviations identified as non-rectifiable in Q1-Q3: CASA CSP - 0; CCAP - 0; CIP - 0; EQRA - 3; THRC - 0.

	CRITICAL	MAJOR	MINOR	TOTAL	%
Design	3	16	5	24	4%
Environmental Safeguards	0	7	2	9	2%
	18	314	260	592	

The following sections provide a detailed overview of findings for each project monitored this quarter, with findings in Q3 consistent with those from previous quarters.

2.2 CENTRAL ASIA-SOUTH ASIA COMMUNITY SUPPORT PROGRAM

In Q3, we undertook monitoring of 67 CASA CSP sub-projects in 67 communities in five provinces. Of the 67 sub-projects visited, 39 related to irrigation (58 percent), 28 to canal rehabilitation, and 11 to protection wall construction. In addition, 17 sub-projects related to grid extension (25 percent), with 15 focused on power line extensions and two on transformer installations. Eleven sub-projects (16 percent) related to road infrastructure; all involving stone masonry retaining wall construction.

In total, engineers made 959 observations during their 67 site visits. Social researchers made in-person site visits to 66 sub-projects in 66 communities in five provinces. We also conducted 211 phone interviews with CDC office-bearers and community members covering 44 sub-projects in 44 communities in four provinces.¹¹

2.2.1 Deviations

Table 12: CASA CSP Deviations in Q3 2021

	CRITICAL	MAJOR	MINOR	TOTAL
Deviations identified in Q3	1	6	1	8
Estimated rectification cost (USD)	300	1,760	450	2,510
Fully rectified in Q3	0	0	0	0
Non-rectifiable	0	0	0	0
Open at the end of Q3	1	6	1	8

Out of 959 Observations made during Q3, we identified eight deviations found in a total of six sub-projects, including one Critical deviation, six Major deviations, and one Minor deviation. No deviations were found in 61 sub-projects (91 percent of those monitored). The deviations were attributed to a lack of proper supervision by the site engineers, negligence by the CDC/contractor, and flooding.

Since this was the first time TPMA monitored CASA CSP, the total number of open deviations is equal to those identified during this reporting period.

¹¹ The number of sub-projects monitored by engineers and social researchers and call center staff does not align due to the deteriorating security situation during this reporting period. See Section 1.4, 'Limitations'.

Table 13: CASA CSP Deviations by Aspect Identified in Q3 2021

	CRITICAL	MAJOR	MINOR	TOTAL
Project Management	1	1	0	2
Materials	0	2	0	2
Environmental Safeguards	0	1	1	2
Workmanship	0	1	0	1
Social Safeguards	0	1	0	1
	1	6	1	8

2.2.2 Financial Review

We assessed 67 sub-projects for possible misalignments between financial and physical progress. We identified no sub-projects where financial progress exceeded physical progress by more than 35 percent but identified four sub-projects where the assessed physical progress was at least 35 percent greater than reported financial progress. We estimated the cost of rectifying identified deviations at USD 2,510.

2.2.3 Sub-Project Status

All 67 sub-projects monitored during this month were listed as ‘Ongoing’ in the Ministry of Rural Rehabilitation and Development (MRRD) Management Information System (MIS), but engineers assessed only 11 (16 percent) as ‘Ongoing’, with the other 56 being ‘Suspended’. The most cited reason for suspension was non-receipt of funds (35 percent, n=20), followed by insecurity (30 percent, n=17).

2.2.4 Beneficiaries

A total of 92,695 people were reported to be living in the 67 communities visited by our engineers, with sub-projects reported as intended to reach 16,447 households in total. Our engineers reported that the sub-projects had reached 15,493 households at the point of their site visits, 94 percent of the planned number of households.

2.2.5 Good Practice and Extra Work

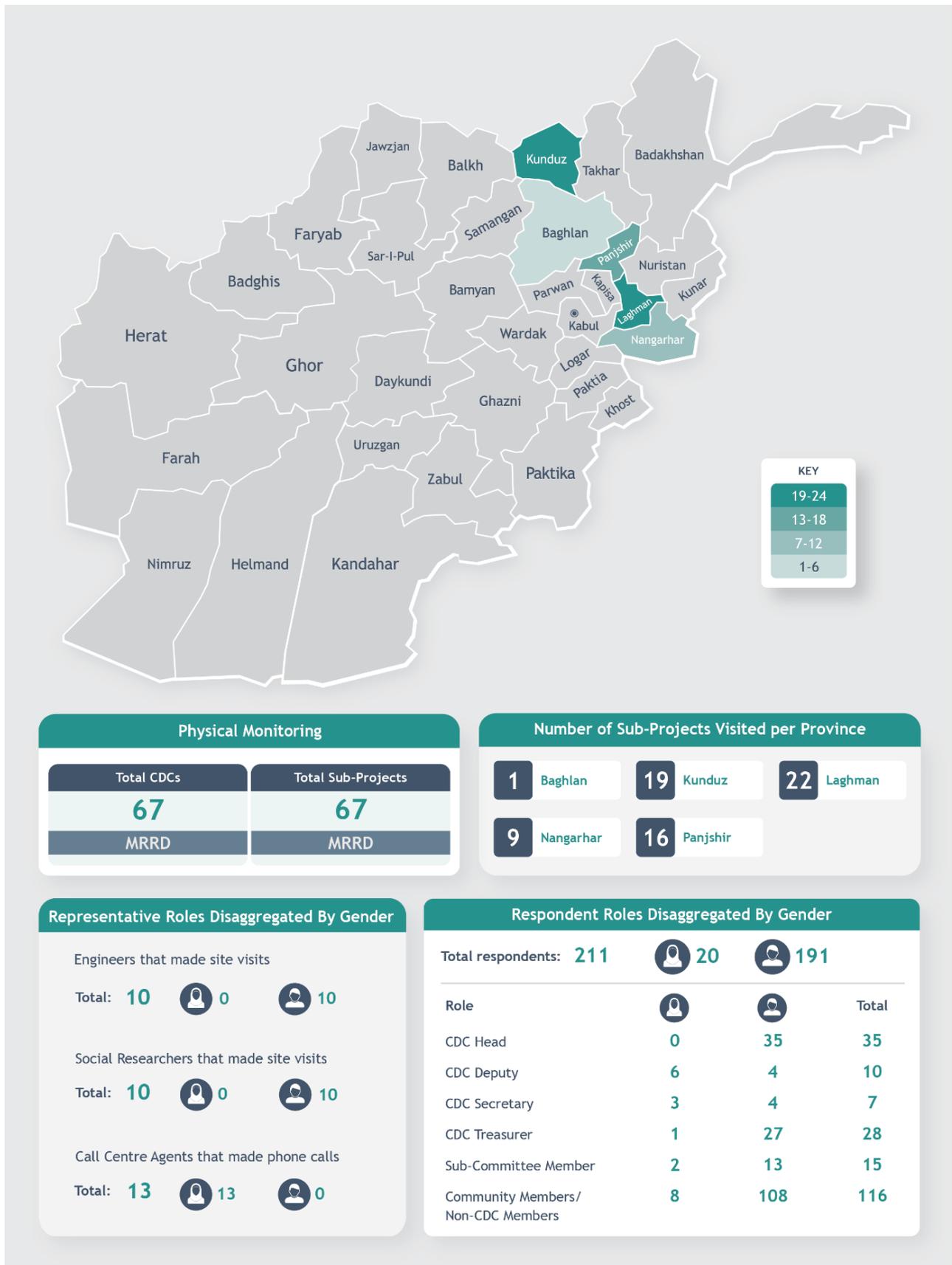
In Q3, no instances of Good Practice or Extra Works were found in any of the sub-projects visited.

2.2.6 Documentation

On average, just over half of required documentation was found to be available for the sub-projects monitored; more than four-fifths of documentation that was not available on site was stated to be available elsewhere. Documents reported to be available for all sub-projects included the sub-project proposal, sub-project contract, and the Bill of Quantities. The document reported to be least available was the Time Bound Workplan.

In terms of CDC documentation, social researchers found that 50 percent of the documentation (n=262) was available on site, with 47 percent (n=250) reported to be available elsewhere. For five documents respondents were unsure if they were available or not, while 11 documents were reported not to exist, most often the Community Contribution Plan.

Figure 3: Map of TPM Activities for CASA CSP in Q3 2021



2.2.7 Operation and Maintenance Plans

While none of the 67 sub-projects monitored had been completed, MRRD had designed and prepared O&M Plans for 15 of them (22 percent), all clearly outlining the responsibilities of the O&M sub-committees. In each case, the CDC was responsible for implementation. However, only five of these Plans related to the 18 sub-projects where physical progress had been assessed as between 75 and 99 percent complete, meaning that 13 sub-projects were nearing completion but as yet had no O&M Plan in place.

2.2.8 Environmental Safeguards

Engineers reported no negative environmental impacts from any of the 67 sub-projects they visited. However, for 14 out of 67 sub-projects monitored (21 percent), engineers reported that the disposal of waste material had not been discussed with the community, and for five out of 67 sub-projects (seven percent), engineers reported that transportation of construction materials had caused land degradation or soil erosion.

Engineers found that trees had been cut at two out of 67 sub-projects, both in Panjshir province. In all, 16 trees were reported to have been cut, with no additional trees planned to be cut. Engineers reported that none of the trees had yet been replanted.

Engineers reported that more than half of the sub-projects (54 percent, n=36) had an Environmental and Social Screening Checklist-based Environmental and Social Management Plan (ESMP) available. In addition, the checklist was reported to be available elsewhere for 21 sub-projects (31 percent), while for 10 sub-projects (15 percent) the document was reported not to exist (seven of these 10 sub-projects being in the Kama district in Nangarhar). Similarly, the ESMP was available for 20 sub-projects (30 percent), deemed unnecessary for 40 sub-projects (60 percent), and reported not to exist for seven sub-projects (10 percent), six of which were in the Unaba district in Panjshir.

2.2.9 Social Safeguards

Workers were seen wearing Personal Protective Equipment (PPE) at four of the nine sites where workers were observed on site. Although safety training for workers had been conducted at eight of these, none had a First Aid kit available. Minors were not reported to be working at any sites. Drinking water was provided to workers at five out of nine sites and all workers reported they were paid regularly, working an average of eight hours per day.

An incident reporting system was not in place for any of the nine sub-projects where work was ongoing. There were no workplace injuries reported from any sub-project in the last 90 days.

Three sub-projects were found to be prone to flooding, two in Kunduz where flooding had caused a deviation, as well as in one in Laghman. The sub-project in Laghman did not have mitigation measures in place; the situation for the Kunduz sub-projects was not established.

Landmines were not reported to be present near any of the sub-projects and engineers reported that almost half of the monitored sub-projects (46 percent, n=31) had a landmine form¹² available, while for 22 sub-projects (33 percent) a landmine form was reported to be available elsewhere; 14 sub-projects (21 percent) did not have a landmine form.

For 35 out of 67 sub-projects (52 percent), an Environmental and Social Safeguards (ESS) focal point was reported as having been appointed within the community for the sub-project.

None of the sub-projects monitored were deemed at risk of contaminating nearby sources of drinking water. Similarly, neither noise pollution nor dust pollution were reported for any of the sub-projects that were ongoing.

2.2.10 Land Acquisition

Engineers reported that land had been acquired for 25 percent (n=17) of monitored sub-projects, with land transfer documentation available for 11 sub-projects, two-thirds of those sub-projects where land was acquired.

Engineers reported that the source of land acquired was mostly private (41 percent, n=7) or community owned (29 percent, n=5). Land was exclusively acquired through donation (100 percent, n=17). There were no households reported to have been affected by loss of land. Social researchers confirmed that no people were reported as having been forced to leave their lands as a result of land acquisition and no land had been donated involuntarily.

2.2.11 Grievance Management

Almost all the CDC office-bearers and sub-committee members (89 percent, n=85) reported the presence of a Community Participatory Monitoring/Grievance Handling Mechanism Sub-Committee (CPM/GHM).¹³ More than two-thirds of those that did so reported that the CPM/GHM included female members (73 percent, n=62).

In 36 out of 44 communities (82 percent), all CDC office-bearers and sub-committee members agreed that their community had a CPM/GHM; in 30 of these (68 percent), all CDC office-bearers and sub-committee members agreed that the CPM/GHM contained female members. We look for communities where CDC office-bearers/sub-committee members all agree that there is no CPM/GHM in place. There were no instances reported in this quarter. Although it is common for some office-bearers/sub-committee members to be unaware when a CPM/GHM mechanism is in place, universal reporting that the mechanism is not in place is a strong indicator that it has not been established. However, there were four

¹² A landmine form is completed to identify whether landmines exist within one kilometer of the construction site.

¹³ CASA CSP follows CCAP principles in the establishment of a CPM/GHM. The CCAP Operations Manual requires the establishment of a CPM/GHM to be primarily responsible for handling the participatory monitoring, social audits, and grievance redressals at the community level. For simplicity, and in alignment with the CCAP Operations Manual, in this report we will refer to the sub-committee as "CPM/GHM".

communities where all CDC office-bearers and sub-committee members agreed the CPM/GHM contained no female members.

From the 211 phone respondents, 17 (eight percent), 16 men and one woman, stated that grievances related to the sub-project had been reported.

2.2.12 Community Consultation

PARTICIPATORY ACTIVITIES

On average, 75 percent of respondents reported that all five required social mobilization activities had occurred. The Well-Being Analysis (WBA) was most frequently identified by phone respondents as having taken place (92 percent, n=195), while the Seasonal Calendar (63 percent, n=133) and Women's Mobility Mapping were least mentioned (62 percent, n=130). The latter is to be expected given that it is conducted in a female-only space, which might impact broader awareness of the activity.

The WBA had the largest number of participants, with an average of 143, while the Women's Mobility Mapping had the smallest number, with an average of 50, but the latter was to be expected since only women are involved in this activity.

On average, almost all (94 percent) respondents who reported community mobilization activities had taken place also reported that the activities had benefited their community. The benefits mentioned included increased knowledge relating to resourcing/financing and a reduction in traditional expenses, increased knowledge about seasonal work, and increased solidarity among community members and empowerment of women.

Almost one-third of all respondents (29 percent, n=62), representing 29 communities, reported that recent updates had been made to WBA. Most of these (n=55) reported that their household had been moved to another category in the revision.¹⁴ Moreover, 33 out of 62 respondents (53 percent) reporting that updates had been made to the WBA said their income had stayed the same since the original WBA, 25 (40 percent) said it had increased, and four (seven percent) said it had decreased. Those who said it had decreased pointed to unemployment and a bad agricultural season as main reasons for the decrease.

Social researchers also enquired whether the WBA had been revised since it was originally conducted. They reported that this was the case for only two sub-projects, significantly lower than the number reported by phone respondents.

¹⁴ Under the Citizens' Charter Afghanistan Project (CCAP), Well-Being Analyses may have been initially completed several years ago. When the CASA Community Support Project was restructured in 2021, one requirement was that its implementation should align with that CCAP. In communities where CCAP and CASA CSP overlapped, both their Community Development Plans and WBAs were meant to be updated.

CDC ELECTIONS

The 211 respondents interviewed by call center staff estimated the proportion of eligible voters participating in CDC elections at 82 percent for all eligible male and female voters and 49 percent for female voters.¹⁵ In the four provinces for which phone interviews were conducted, Nangarhar reported the highest percentage of participation by all eligible voters (men and women) at 89 percent, while Panjshir had the lowest percentage of participation at 77 percent. However, Panjshir had the highest average of eligible female voters at 56 percent, with Laghman reporting the lowest participation of eligible female voters at 44 percent.

COMMUNITY DEVELOPMENT PLAN

Social researchers found that the Community Development Plan (CDP) was available for 40 communities (61 percent). In 25 communities (38 percent), social researchers found that the CDP was unavailable; in all but one case, social researchers said that the document was reported as available elsewhere. In one community, the person social researchers interviewed did not know whether the CDP was available or whether it existed or not.

Most CDC office-bearers and sub-committee members indicated that, in preparing a CDP, the CDC had conducted a participatory community analysis (91 percent, n=86) and processes to define community priorities (95 percent, n=90). When asked whether issues identified by women had been included in the CDP, 85 percent (n=17) of all women said this had been the case, compared to 70 percent (n=134) of all men. Finally, four-fifths of all respondents who were not CDC office-bearers reported that they were consulted on the CDP.

SUB-COMMITTEE FORMATION

Most respondents (87 percent, n=184) stated that sub-committees had been formed. Of the CDC office-bearers and sub-committee members reporting this, 97 percent (n=90) said the facilitation partner had met with the CDC to explain the roles and responsibilities of sub-committees. Similarly, 94 percent (n=87) reported that the roles and responsibilities of sub-committees were fully clear to them, four respondents that they were somewhat clear, and two that they were unclear.

There was little difference between respondents reporting that the different types of sub-committees (Agriculture, Education, Environment, Health, Vulnerability & Disaster Management, and Youth) had been established, with between 85 and 87 percent agreeing. Similarly, there were no major differences reported between sub-committees in terms of meeting frequency, with an average of 71 percent of respondents saying that they met at least once a month.

¹⁵ From the data, we suspect that some respondents may have confused CDC elections with general elections when responding to this question.

2.2.13 Maintenance and Construction Cash Grants and Social Inclusion Grants

According to our engineers, 28 of the 67 communities (42 percent) had received Maintenance and Construction Cash Grants (MCCGs). Most of the communities that had received MCCGs (64 percent, n=18) had a list of participants available and were confirmed as having paid verified wages to beneficiaries through direct contact (82 percent, n=23). Women were not reported to have participated in MCCG work schemes; on average 72 households per community had participated.

In addition, engineers found that 27 communities (40 percent) had received Social Inclusion Grants (SIGs). For communities that received SIGs, 74 percent (n=20) had a list of recipients available. For all communities where a Poverty Chart was available (70 percent, n=19), the list of recipients had been checked against the Well-Being Analysis of the Poverty Chart, and the SIG recipients fell within the Poor or Very Poor categories for all but two of these communities.

2.2.14 Vulnerable Groups and Gender

Almost all respondents (94 percent, n=199) reported that there were newcomers in their communities, of whom most respondents reported the presence of IDPs (89 percent, n=178), economic migrants (86 percent, n=172), and, to a lesser extent, returnees (65 percent, n=130). Almost two-thirds of CDC office-bearers and sub-committee members who reported that there were IDPs in their community (66 percent, n=61) also stated that these IDPs were represented in their CDC. This figure was slightly lower for returnees (56 percent, n=50) and economic migrants (59 percent, n=54).

When asked whether their CDC contained female members, most respondents (83 percent, n=149) agreed, with a slightly higher share of men doing so (83 percent, n=136) than women (81 percent, n=13). There were 29 communities (66 percent) where every respondent reported their CDC contained at least one female member, and no community where every respondent agreed there were none.

Social researchers reported that, for most sub-projects (91 percent, n=60), both women who were CDC office-bearers or sub-committee members and other female community members had been consulted during sub-project implementation. However, for six sub-projects (nine percent), only female CDC office-bearers or sub-committee members had been consulted and no other female community members.

Although social researchers' questionnaires were designed to identify relevant gender-disaggregated data, advances made by the Taliban and increased insecurity made it more difficult to speak to women generally during the reporting period. The small number of female respondents (20 out of 211) were reached mainly by telephone, and it is difficult to draw other reliable conclusions about differential responses between male and female respondents.

2.2.15 Minimum Service Standards

Responses on whether Minimum Service Standards were met varied widely between communities. More than four-fifths of respondents (88 percent, n=185) from the 44 sub-projects monitored through phone interviews reported that there was an education facility nearby, and almost all of them (99 percent, n=183) agreed that teachers in the education facility had at least a Grade 12 education. While 86 percent (n=160) and 83 percent (n=154) reported classes to be available for students in Grades 1-3 and 4-6 respectively, this percentage dropped to 64 percent (n=119) for students in Grades 7-12. On average, respondents reported students spent 18 hours per week in school in Grades 1-3, increasing to 25 hours per week in Grades 4-6, and 32 hours in Grades 7-12.

Almost three-quarters of the 211 respondents (73 percent, n=155) reported that there was a health facility nearby; most of these respondents (90 percent, n=139) reported that the health facility was open during normal working hours. The most common cited health center was a comprehensive health center (62 percent, n=96).

Most respondents reported that their community had access to water (81 percent, n=171). Of these respondents, 21 percent (n=35) said the water available was insufficient. Almost one-fifth of respondents (19 percent, n=40) said there was none.

More than four-fifths of respondents (82 percent, n=173) reported that they had basic road access and two-thirds of respondents reported having access to electricity and to irrigation (both 66 percent, n=140). Four respondents reported that they did not have access to any of the above. However, there were no communities where all respondents agreed the latter was the case.

2.2.16 Overall Assessment

The 67 sub-projects monitored by our engineers were scored and rated as follows:

- 62 sub-projects (93 percent) were rated as Good;
- 4 sub-projects (six percent) were rated as Average; and
- One sub-project (one percent) was rated as Below Average.

As a result, based on the sub-projects monitored in this reporting period, we assess CASA CSP's performance as **Good**.

2.3 CITIES INVESTMENT PROGRAM

In Q3, our staff visited 13 sub-projects in four provinces (Balkh, Herat, Khost, and Nangarhar), of which eight were emergency sub-projects implemented in response to COVID-19. Our engineers assessed physical progress, which was then compared to financial expenditure to date. Government engineers or project staff accompanied our staff on 12 of the 13 site visits, during which we interviewed a range of respondents, including contractors, Project Implementation Unit (PIU) staff, community members, workers, and shopkeepers.

2.3.1 Deviations

Out of 410 observations made during our site visits, our engineers did not identify any deviations. They identified five Notifications (Minor deviations with an estimated rectification cost of less than USD 50).

2.3.2 Financial Review

Financial progress did not exceed physical progress by more than 35 percent in any of the 13 sub-projects.

2.3.3 Sub-Project Status and Good Practice

Our engineers found that work was Completed and in the Defect Liability Period at five sub-projects, Completed and outside the Defect Liability Period at four, Suspended at one, and Ongoing at three. The engineers found that only one of the 13 sub-projects had been delayed before being completed, but all four assessed Ongoing and Suspended sub-projects were behind schedule.

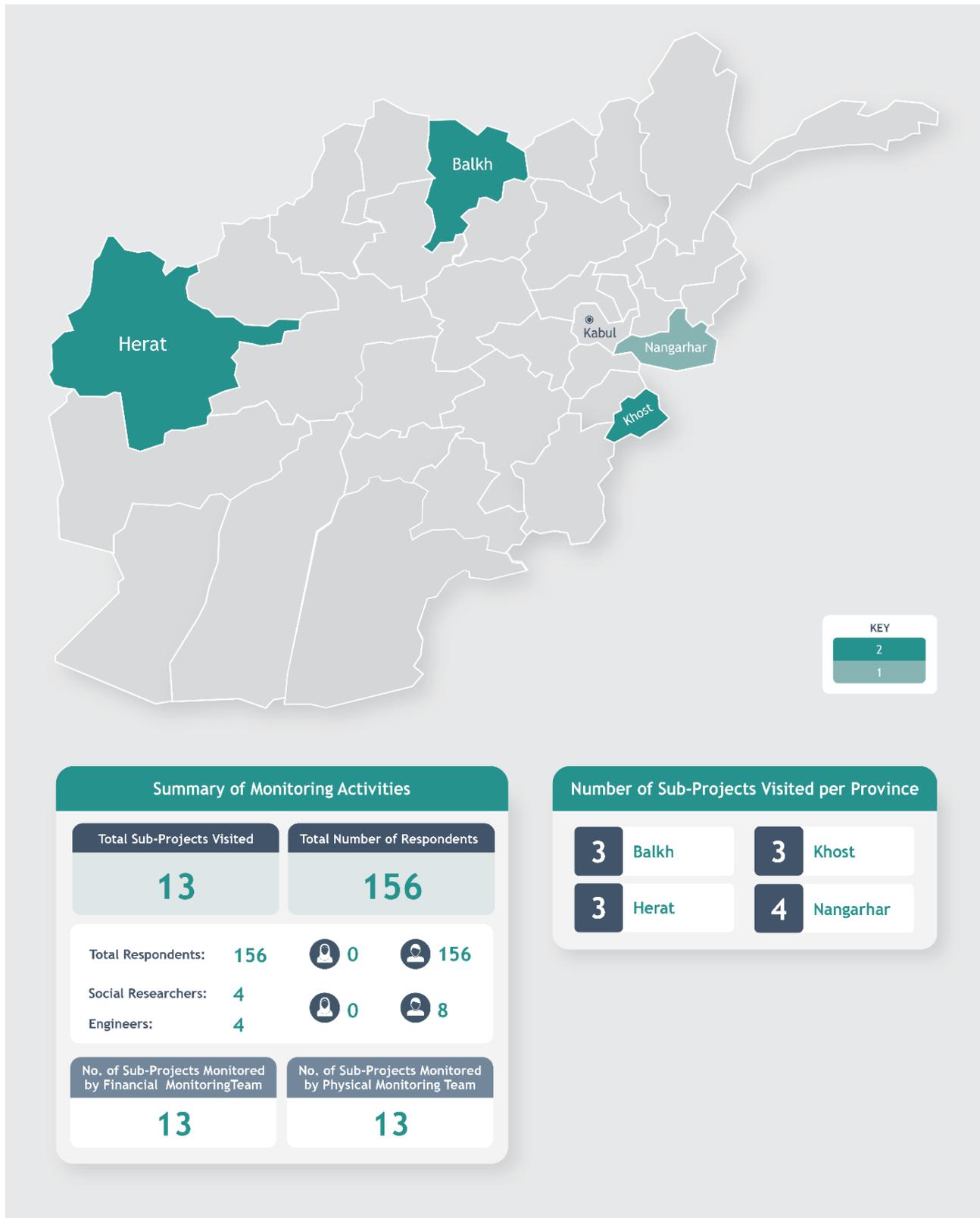
Our engineers found no instances of Good Practice or Extra Works in this reporting period.

2.3.4 Health and Safety

To assess occupational health and safety, we look at measures to ensure site safety, signs of hygiene issues at labor camps, and evidence of child employment. In Q3, our engineers only assessed environmental and social safeguards at the three sub-projects where work was ongoing. Our engineers reported that workers at all three had been provided with PPE and safety training was available, and two out of three sites had First Aid kits available. Injuries to workers during sub-project construction were reported at two sub-projects and to a community member at another. The community member's injury was minor and was not reported to the contractor.

Minors were observed working on two sites, although this was not corroborated by community respondents in one of the two sites. No hygiene issues were observed in workers' campsites. Public safety measures were lacking at all three sites where work was ongoing, with barricades and site fencing not in place.

Figure 4: Map of TPM Activities for CIP in Q3 2021



2.3.5 Economic Disruption

We received two reports that sub-project construction had caused economic disruption. One shopkeeper reported a drop in income, but this was not corroborated by the contractor. None of the shopkeepers reported having been forced to relocate.

2.3.6 General Environmental Impact

Overall, we did not identify any significant negative environmental impacts, although our engineers observed limited air pollution from dust, smoke, or fumes at three sites, as well as noise pollution, assessed as Medium at two sites and Low at another. None of the sub-projects had a waste/debris disposal plan in place.

Table 14: Environmental Impact of Sub-Project Activities and Mitigation Measures

ENVIRONMENTAL IMPACT	SUB-PROJECTS
Air pollution	Low=3
Protective measures for existing trees	Yes: 1
Noise	Medium=2 / Low=1
Waste/debris disposal plan in place	0

2.3.7 Land Acquisition and Resettlement

Land acquisition was not required for the sub-project and no homes had been relocated due to the sub-project construction.

2.3.8 Grievance Management

At three out of 13 sub-projects, our engineer reported that a formal group or committee to deal with grievances was in place, although it did not include female members. A GRM logbook was available at two out of 13 sub-projects. Information on how to lodge a grievance was not visible at 10 sites. In some cases, PIU staff said they did not know about grievance mechanisms while community members or workers said they were aware of them. None of the Grievance Handling Committees (GHCs) were reported to have women members.

Community respondents or workers lodged grievances in seven out of the 13 sub-projects (54 percent). These included grievances on dust and pollution, delays and the slow pace of work, road design, poor quality of materials used during construction, and the hiring of local workers due to cultural sensitivities. Resolved grievances were reported in three of the seven sub-projects (42 percent) and related to dust and pollution (District 6, Herat), delays and the slow pace of work (District 11, Herat), and poor quality materials used during construction (District 8, Nangarhar). Two of the three were resolved at the local GHC level, while the grievance lodged on poor-quality materials used during construction was resolved at the level of the IDLG. All grievances were resolved within five days and all respondents reported satisfaction with the resolution.

2.3.9 Overall Assessment

All 13 sub-projects monitored were assessed as Good. The overall rating for CIP based on the sub-projects monitored in this period is **Good**.

2.4 CITIZENS’ CHARTER AFGHANISTAN PROJECT

This section reports on our monitoring of project activities in the core Citizens’ Charter Afghanistan Project. Monitoring of COVID-19 emergency response activities delivered through the ‘Dastarkhan-E-Milli’ COVID-19 Emergency Relief program is reported in Section 1.2.

In Q3, our engineers conducted in-person visits to 425 CDCs, monitoring 490 CCAP sub-projects in 29 provinces. Out of these, 34 of the sub-projects were managed by IDLG and 456 by MRRD. In addition, social researchers made in-person site visits to 489 sub-projects in 424 communities in 29 provinces. We also conducted 2,895 phone interviews with CDC office-bearers and other community members covering 467 sub-projects in 403 communities in 26 provinces,¹⁶ of which 34 sub-projects were managed by IDLG and 433 by MRRD.

The sub-projects monitored were based on a targeted sample to assess project progress and evaluate social and environmental impacts to date. Out of the 490 active sub-projects monitored, most related to improving water access (44 percent, n=218), followed by irrigation (41 percent, n=200), road infrastructure (nine percent, n=46), renewable energy (three percent, n=14), power supply (two percent, n=8), grid extension (one percent, n=3), and a park and recreation area (0.2 percent, n=1)

2.4.1 Deviations

No deviations were noted in 56 percent of IDLG sub-projects (19 out of 34) and 63 percent of MRRD sub-projects (285 out of 456). Out of 13,717 Observations made in site visits to the 490 sub-projects, our engineers identified 299 deviations: nine Critical, 166 Major, and 124 Minor. Seven of the nine identified Critical deviations (78 percent) were found in MRRD-managed sub-projects.

Table 15: CCAP Deviations in Q3 2021

	CRITICAL	MAJOR	MINOR	TOTAL
Deviations identified in Q3	9	166	124	299
Estimated rectification cost (USD)	28,250	56,490	39,874	124,614
Fully rectified in Q3	5	96	69	170
Agreed as non-rectifiable	0	12	13	25
Open at the end of Q3	38	1,089	918	2,045

¹⁶ The number of sub-projects monitored by engineers and social researchers and call center staff does not align due to the deteriorating security situation during this reporting period. See Section 1.4, ‘Limitations’.

Most deviations (72 percent, n=214) were identified in Water Supply, Sanitation, and Hygiene Education sub-projects, accounting for three-quarters (76 percent, n=211) of all deviations for MRRD-managed sub-projects, with just under a quarter accounted for by small-scale irrigation (22 percent, n=60). For IDLG, Road/Street Upgrading and Drainage accounted for 68 percent of all deviations. These findings are consistent with those from previous reporting periods.

In Q3, three of the nine Critical deviations were attributed to design issues, three to project management quality, two were found in relation to the O&M Plans, and one related to the materials used. The most common attributed causes of Major deviations were O&M Plans not being implemented (48 percent, n=80), often due to a lack of CDC facilitation and community contributions, and project management (24 percent, n=40). These findings are consistent with previous reporting periods.

Table 16: CCAP Deviations by Aspect Identified in Q3 2021

	CRITICAL	MAJOR	MINOR	TOTAL
Project Management	3	40	61	104
O&M Plan	2	80	11	93
Materials	1	10	32	43
Social Safeguards	0	21	6	27
Workmanship	0	7	10	17
Design	3	5	3	11
Environmental Safeguards	0	3	1	4
	9	166	124	299

2.4.2 Financial Review

We reviewed financial data for 490 sub-projects being implemented by 425 CDCs, involving contracts worth USD 17,278,708. We identified two cases where the financial progress percentage was more than 35 percentage points greater than the estimated physical progress percentage, with the misaligned amount totaling USD 7,749. The cost of rectifying deviations identified during Q3 is estimated at USD 124,614.

Our assessment also identified 70 sub-projects where the assessed physical progress was at least 35 percent greater than reported financial progress. For two of these sub-projects, we found that no payments had been made to contractors, while the assessed physical progress for one sub-project (14-1401-M0092-1-a) was 100 percent Complete. Of the 70 sub-projects, 62 were assessed 100 percent Complete while financial progress ranged from 0 to 65 percent. From previous reporting, we believe these differences to arise from late submission of expenditure documentation by the CDCs (many of which are in remote areas) as well as delays in entering this information into MIS.

2.4.3 Sub-Project Status

Our engineers assessed over three-quarters (84 percent, n=413) of 490 sub-projects visited as Completed (30 IDLG-managed sub-projects and 383 MRRD-managed sub-projects), compared to 358 (73 percent) in

MIS.¹⁷ Additionally, our engineers assessed 17 sub-projects as Ongoing (three percent), including one IDLG managed and 16 MRRD managed; and 60 as Suspended (12 percent), including three IDLG managed and 57 MRRD managed. While most sub-projects (78 percent, n=47) had only been suspended for three months or less, 13 MRRD-managed sub-projects had been suspended for a longer period. In comparison, MIS listed 132 of the visited sub-projects as Ongoing (27 percent: three IDLG-managed sub-projects and 129 MRRD-managed sub-projects) and none as Suspended.

For six sub-projects, MIS-reported progress was at least 15 percentage points higher than that assessed by our engineers. Conversely, progress for 53 sub-projects was reported in MIS as at least 15 percentage points below that assessed by our engineers. In addition to delays in updating MIS, another potential reason for the discrepancy in the number of Ongoing sub-projects could be that MIS does not track the temporary suspension of sub-projects.

Of 413 Completed sub-projects, our engineers assessed 336 as Operational (81 percent), including 30 managed by IDLG and 306 managed by MRRD. Seventy MRRD-managed sub-projects (17 percent) were assessed as Partially Operational and seven MRRD-managed sub-projects (two percent) as Not Operational.

2.4.4 Good Practice and Extra Works

In Q3, our engineers recorded 16 instances of Good Practice in 11 MRRD-managed sub-projects and one IDLG-managed sub-project. There was one sub-project with four instances of Good Practice: in Kariz Pay Sufla village, Miramor district, Daykundi.

Examples of Good Practice included the construction of a fence to prevent theft or people from wandering into dangerous areas, or a protection or retaining wall to reduce the vulnerability of the sub-project to natural disasters.

In addition, our engineers identified 18 instances of Extra Works in 18 MRRD-managed sub-projects. Seven of these related to building more or larger water reservoirs than planned, while the rest related to building longer canals than planned.

2.4.5 Community Engagement

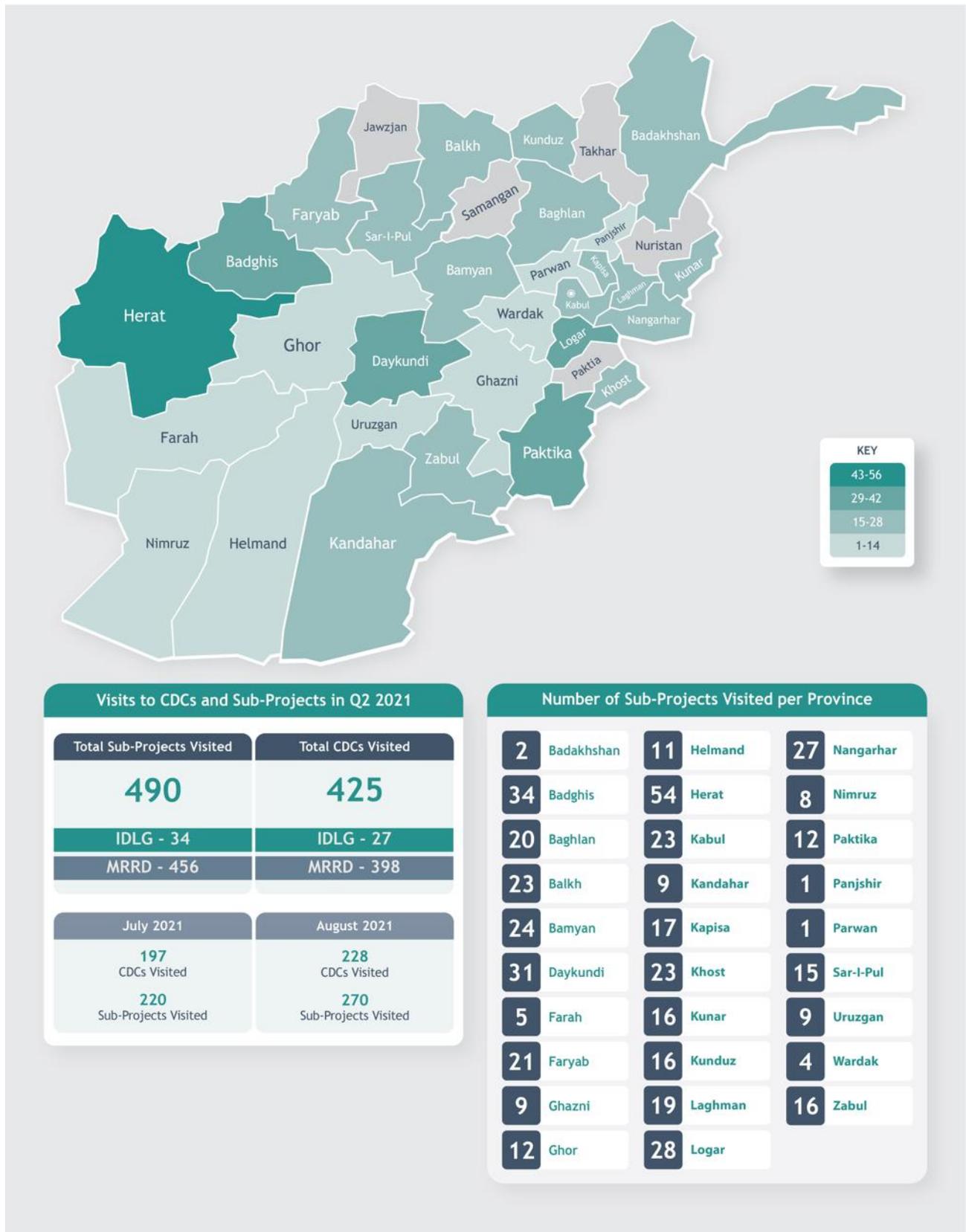
PARTICIPATORY COMMUNITY ACTIVITIES

Five types of participatory activities are required by CCAP guidelines to assess community needs and improve sub-project planning: a Leaking Pot Exercise, Resource Mapping, a Seasonal Calendar, a Well-Being Analysis (WBA), and Women's Mobility Mapping. On average, 70 percent of respondents reported that all five activities had occurred. The WBA was most frequently identified by phone respondents as having taken place (84 percent, n=2,438), while the Seasonal Calendar was least cited (57 percent, n=1,644). For all activities, a significantly larger share of respondents from urban (IDLG-managed) sub-

¹⁷ The difference in MIS reporting is a result of the time it takes to prepare and submit documentation and the Sub-Project Final Status Report from the provincial PMUs into the central MIS.

projects compared to respondents from rural (MRRD-managed) sub-projects reported activities as having taken place. On average, 82 percent of all phone respondents from IDLG-managed sub-projects reported this compared to 69 percent of respondents from MRRD sub-projects. Social researchers reported that all five activities had been conducted in 72 percent of monitored sub-projects on average, aligning with reports from phone respondents.

Figure 5: Map of TPM Activities for CCAP in Q3 2021



Visits to CDCs and Sub-Projects in Q2 2021	
Total Sub-Projects Visited	Total CDCs Visited
490	425
IDLG - 34	IDLG - 27
MRRD - 456	MRRD - 398
July 2021	August 2021
197 CDCs Visited	228 CDCs Visited
220 Sub-Projects Visited	270 Sub-Projects Visited

Number of Sub-Projects Visited per Province					
2	Badakhshan	11	Helmand	27	Nangarhar
34	Badghis	54	Herat	8	Nimruz
20	Baghlan	23	Kabul	12	Paktika
23	Balkh	9	Kandahar	1	Panjshir
24	Bamyan	17	Kapisa	1	Parwan
31	Daykundi	23	Khost	15	Sar-I-Pul
5	Farah	16	Kunar	9	Uruzgan
21	Faryab	16	Kunduz	4	Wardak
9	Ghazni	19	Laghman	16	Zabul
12	Ghor	28	Logar		

IDLG-managed sub-projects were reported to have around 25 percent more participants on average, which may reflect that IDLG-managed sub-projects are implemented in more densely populated areas. Moreover, more men than women participated in all activities except the Women's Mobility Mapping exercise, in which only women participate.

On average, the WBA had the largest number of reported participants: 66 men and 48 women on average for IDLG sub-projects and 59 men and 38 women on average for MRRD sub-projects. Excluding the Women's Mobility Mapping exercise, the activity with the smallest number of reported participants was the Seasonal Calendar, which had 61 men and 41 women on average for IDLG-managed sub-projects and 49 men and 31 women on average for MRRD-managed sub-projects.

Almost all (92 percent) respondents who reported community mobilization activities had taken place also reported that the activities had benefited their community. The benefits included increased knowledge relating to resourcing/financing and a reduction in traditional expenses, increased knowledge about seasonal work, and increased solidarity among community members and empowerment of women. On average, the activity with the largest share of respondents citing benefits was the Resource Mapping activity (95 percent, n=2,123), while the Women's Mobility Mapping activity had the lowest share (88 percent, n=1,563), although this is an activity in which only women participate.

Respondents from IDLG-managed sub-projects appeared slightly more positive about activity benefits compared to respondents from those managed by MRRD. Percentages from both groups of respondents were very high, however, with 96 percent on average for IDLG-managed sub-projects and 91 percent on average for those managed by MRRD. Details about how men and women separately perceived benefits are discussed in the Gender section.

CDC ELECTIONS

In Q3 interviews, our call center staff interviewed 2,895 respondents in 403 communities who were asked to estimate the proportion of eligible voters that participated in their local CDC elections. On average, respondents estimated that 82 percent of male and 54 percent of female eligible voters participated.¹⁸ The participation of eligible female voters was estimated to be four percentage points higher by female respondents when compared to male respondents, possibly suggesting that a higher share of women participated than was thought by most men. Reported participation did not vary significantly between respondents from IDLG-managed and MRRD-managed sub-projects.

Most respondents reported that people living with a disability were able to participate in CDC elections (85 percent, n=2,464). In addition, almost all respondents (97 percent, n=2,810) indicated that no challenges were encountered in getting eligible men and women to participate. Of those that did report challenges, all but three respondents came from MRRD-managed sub-projects. The challenges identified related to alleged electoral fraud or corruption (27 percent, n=23) and insecurity (24 percent, n=21); of

¹⁸ From the data, we accept that some respondents may have confused CDC elections with general elections when responding to this question.

the latter, 13 cases related to general insecurity and eight were attributed to the Taliban. Other common challenges included community disagreements about the candidates (17 percent, n=14).

Table 17: Average Estimated Percentage of Eligible Voters Participating in CDC Elections

ACTIVITY	ALL RESPONDENTS	MALE RESPONDENTS	FEMALE RESPONDENTS
Average estimated percentage of eligible voters (male and female) that participated	82%	81%	82%
Average estimated percentage of eligible female voters that participated	54%	53%	57%

COMMUNITY DEVELOPMENT PLAN CONSULTATION

Of the 27 communities with IDLG-managed sub-projects visited by social researchers, 15 (56 percent) were reported to have a CDP available, compared to 397 communities with MRRD-managed sub-projects, where 286 communities (72 percent) reported the same. For 84 percent (n=103) of the communities where the CDP was not available, it was reported to be available elsewhere (11 communities with IDLG-managed sub-projects, 92 communities with MRRD-managed ones). For six communities (five percent), the CDP was reported not to exist, and for 14 communities with MRRD-managed sub-projects (11 percent), the person social researchers interviewed did not know whether the CDP was available or whether it existed.

Most CDC office-bearers and sub-committee members indicated that the CDC had conducted a participatory community analysis (89 percent, n=1,005) and processes to define community priorities (91 percent, n=1,027) when preparing a CDP. Similarly, 92 percent (n=1,040) of CDC office-bearers and sub-committee members said they had been consulted about the CDP. In addition, almost two-thirds of all respondents (65 percent, n=1,885) said proposals identified by women were included in the CDP. However, there were differences between both IDLG and MRRD respondents and male and female respondents:

- Seven percent more CDC office-bearers and sub-committee members from IDLG-managed sub-projects reported that the CDC conducted a participatory community analysis and a process to define key community priorities compared to those from MRRD-managed sub-projects.
- Almost all respondents from IDLG-managed sub-projects (91 percent, n=184) said that proposals identified by women were included in the CDP compared to only 63 percent (n=1,701) of respondents from MRRD-managed ones.
- Six percent fewer female CDC office-bearers and sub-committee members reported that the CDC had conducted a process to define key community priorities and nine percent fewer that they had been consulted on the CDP, compared to their male counterparts.

Elders (98 percent, n=939) and male members of the community (96 percent, n=920) were reportedly almost always consulted. Women were reported to be consulted slightly less often, although 89 percent of CDC office-bearers and sub-committee members (n=853) did report that women had been consulted.

Although the share of women consulted was reportedly higher for IDLG-managed sub-projects than MRRD-managed ones, the opposite was the case for young people, people living with disabilities, and IDPs and returnees, where present. For these groups, respondents reported they were more frequently consulted in MRRD-managed sub-projects than in IDLG-managed ones.

SUB-COMMITTEE FORMATION

More than three-quarters of all respondents (76 percent, n=2,211) stated that sub-committees had been formed: 181 respondents from IDLG-managed sub-projects (90 percent) and 2,030 respondents from those managed by MRRD (75 percent). There were significant variations depending on the type of respondent. While almost all CDC office-bearers and sub-committee members (92 percent, n=1,045) stated that sub-committees had been formed, the figure was considerably lower among ordinary community members (67 percent, n=907) and those from the lower quartiles (58 percent, n=144). Overall, female CDC office-bearers and sub-committee members were just as likely to report sub-committee formation as their male counterparts. However, female community members and women from lower quartiles were less likely than men to report sub-committee formation. More analysis about these gender differences is provided in the Gender section.

For MRRD sub-projects, 90 percent (n=875) of CDC office-bearers and sub-committee members reporting that sub-committees had been formed said the Facilitating Partner had met with the CDC to explain the roles and responsibilities of sub-committees, compared to 100 percent (n=75) of CDC office-bearers and sub-committee members from IDLG-managed sub-projects. In addition, for MRRD sub-projects, over two-thirds (71 percent, n=684) of CDC office-bearers and sub-committee members who had reported that sub-committees had been formed stated that the roles and responsibilities of sub-committees were fully clear to them, 204 (21 percent) that they were somewhat clear to them, and 82 (eight percent) that they were unclear. For IDLG sub-projects, four-fifths (80 percent, n=60) said roles and responsibilities were fully clear, 14 (19 percent) said they were somewhat clear, and only one person said they were unclear.

For both MRRD-managed and IDLG-managed sub-projects, there was little internal variation between the percentages of respondents reporting that different types of sub-committees had been established. In MRRD-managed sub-projects, Health was most commonly cited (73 percent, n=1,962); for IDLG-managed sub-projects, Agriculture was least cited (86 percent, n=174), while 90 percent of respondents (n=181) reported existence of the other five types of sub-committee.

While almost three-quarters of respondents from MRRD-managed sub-projects (73 percent) said that sub-committees met at least once a month, this rose to 85 percent for respondents from IDLG-managed sub-projects.

2.4.6 CCAP Minimum Service Standards

From phone interviews, responses to questions asking if Minimum Service Standards had been achieved varied widely. Almost all respondents from IDLG-managed sub-projects (90 percent, n=181) reported a

nearby education facility compared to just over two-thirds of MRRD respondents (71 percent, n=1,909). From the IDLG respondents that reported a nearby education facility, 68 percent (n=123), 59 percent (n=106), and 51 percent (n=93), respectively, stated that classes were available for Grades 1-3, 4-6, and 7-12. The equivalent figures for MRRD respondent were slightly higher for all three grade groups, at 75 percent (1,423), 71 percent (n=1,354), and 55 percent (n=1,051).

Table 18: Minimum Service Standards - Education I

MINIMUM SERVICE STANDARDS	IDLG RESPONDENTS		MRRD RESPONDENTS	
	N	%	N	%
There is an education facility within 3 km of the community	181/202	90%	1,909/2,693	71%
Teachers in the education facility have at least Grade 12 education	N/A	N/A	1,768/1,909	93%
Teachers in the education facility have at least Grade 14 education	157/181	87%	N/A	N/A
At the education facility, classes are available for students Grades 1-3	123/181	68%	1,423/1,909	75%
At the education facility, classes are available for students Grades 4-6	106/181	59%	1,354/1,909	71%
At the education facility, classes are available for students Grades 7-12	93/181	51%	1,051/1,909	55%

Table 19: Minimum Service Standards - Education II

MINIMUM SERVICE STANDARDS	IDLG RESPONDENTS		MRRD RESPONDENTS	
	Mean		Mean	
Average number of hours spent per week of school attendance for students Grades 1-3	18		20	
Average number of hours spent per week of school attendance for students Grades 4-6	24		24	
Average number of hours spent per week of school attendance for students Grades 7-12	31		30	

Almost two-thirds of respondents with IDLG-managed sub-projects (66 percent, n=134) reported a nearby health facility, compared to just over half of MRRD respondents (52 percent, n=1,398). Most of these respondents (83 percent, n=1,267) reported that the facility was open during normal working hours. Respondents from both IDLG- and MRRD-managed sub-projects cited that the basic health center was the most common type of health facility.

Table 20: Minimum Service Standards - Health

MINIMUM SERVICE STANDARDS	IDLG RESPONDENTS		MRRD RESPONDENTS	
	N	%	N	%
Health facility within 5 km of the community	134/202	66%	1,398/2,693	52%
This health facility is open from 8 am to 4 pm	119/134	89%	1,148/1,398	82%

2.4.7 Environmental Safeguards

On trees cut during sub-project construction, engineers found that trees had been cut at 15 of the 456 MRRD-managed sub-projects and at none of the 34 IDLG-managed sub-projects. In all, 1,337 trees were reported to have been cut, including 1,010 trees for one sub-project in Paie Khil village, Puli Alam district, Logar, with a further 37 trees still to be cut. Seedlings had been replanted at 13 out of the 15 sub-projects where trees had been cut, with a total of 2,464 seedlings reported to have been replanted to date; short of the 4,122 seedlings that should have been replanted according to project requirements, which stipulate three seedlings should be replanted for every tree that has been cut.

In two out of 453 MRRD-managed sub-projects, engineers reported negative environmental impacts. For Gazaan village, Faiz Abad district, Badakhshan, waste and water pollution were reported; while for Haji Amir Mohammad Khan Gowhargin village, Nawa-E-Barikzayi district, Helmand, dust and water pollution were reported. For three MRRD-managed sub-projects, no data was available. No negative environmental impacts were cited for any of the 34 IDLG-managed sub-projects.

For 37 out of 456 MRRD-managed sub-projects (eight percent) and three out of 34 IDLG-managed sub-projects (eight percent), engineers reported that the transportation of construction materials had caused land degradation and/or soil erosion. Again, for three MRRD-managed sub-projects, no data was available.

For four of 34 IDLG-managed sub-projects (12 percent) and 86 of 456 MRRD-managed sub-projects (19 percent), a quarry had been required to support construction. While data was not available on five MRRD-managed sub-projects requiring a quarry, none of the other 85 quarries were found to have damaged the environment.

Engineers reported that 32 out of 34 IDLG-managed sub-projects (94 percent) had an Environmental and Social Screening Checklist available; for the other two sub-projects, it was reported not to exist. For MRRD-managed sub-projects, almost two-thirds (60 percent, n=274) were reported to have the document available. For 11 MRRD-managed sub-projects, the document was reported to be available elsewhere, while for the other 171 sub-projects the document was reported not to exist.

Out of the 32 IDLG-managed sub-projects and 285 MRRD-managed sub-projects that had an Environmental and Social Screening Checklist, 10 IDLG-managed sub-projects (31 percent) and 87 MRRD-managed sub-projects (31 percent) were found to not require an ESMP.

Eighteen out of the 22 IDLG-managed sub-projects (82 percent) and 161 out of the 198 MRRD-managed sub-projects (81 percent) that required an ESMP were reported to have one.

2.4.8 Social Safeguards

There were 17 sub-projects where construction was ongoing at the time of the site visits (16 MRRD-managed sub-projects, one IDLG-managed sub-project). Of these, workers were seen on site at 12 sub-projects (11 MRRD-managed sub-projects, one IDLG-managed sub-project). Workers were seen wearing

PPE at only two sites (both MRRD-managed sub-projects), and although safety training for workers had been conducted at eight sites, none of the 12 sites had a First Aid kit available.

Minors were observed working at two MRRD-managed sub-projects. They were being employed by the CDC owing to the lack of adult workers from the community. Our engineer advised the CDCs that minors must not be employed on construction work.

Drinking water was provided to workers at eight out of 12 sites and workers reported they were regularly paid at 10 sites. At six sites, workers reported they worked an average of eight hours per day; at four sites, they reported an average of nine hours; and at two sites, they reported an average of 10 hours. Workers were also asked by the engineer if they had any concerns about the work they were doing and how they were treated, and no issues were reported.

An incident reporting system was not in place for any of the 17 sub-projects where work was ongoing. Our engineers found that workplace injuries had been reported from three MRRD-managed sub-projects in the last 90 days, one in Kunar, in Doshakhil Kasorak village, Asad Abad district, and two in Logar, in Qala-e-Ewaz Khan village, Puli Alam district and Zinak village, Khushi district. In Kunar, the injury required hospitalization, compensation had been paid by the CDC, and the worker had made a full recovery. In Logar, one injury in Qala-e-Ewaz Khan village required hospitalization. Compensation had not been paid for either of the two injuries and the worker injured in Zinak village reportedly had not yet made a full recovery.

No noise or dust pollution were reported by engineers at any of the ongoing sub-projects.

Out of 490 sub-projects monitored, 24 MRRD-managed sub-projects were found to be prone to natural disaster (20 from the threat of flooding, three from landslides, and one from strong winds). Only two of these sub-projects had mitigation measures in place at the time of the site visits.

Of 490 sub-projects monitored, security incidents were reported from eight MRRD-managed sub-projects: two in Logar, one in Nangarhar, one in Balkh, and four in Helmand.

An ESS focal point was reported as having been appointed from within the community for 142 out of 456 MRRD-managed sub-projects (31 percent) and one of the 34 IDLG-managed sub-projects (information was not available for nine MRRD-managed sub-projects).

None of the sub-projects monitored were deemed as posing a risk to nearby sources of drinking water (again, not available for nine MRRD-managed sub-projects), and this was not applicable to another nine MRRD-managed sub-projects.

Engineers reported a mix of 'other' negative ESS findings for six MRRD-managed sub-projects.

2.4.9 Land Acquisition

Engineers reported that land had been acquired for 58 percent (n=285) of monitored sub-projects (one IDLG-managed sub-project and 284 MRRD-managed ones), with land transfer documentation available for 239 MRRD-managed sub-projects, 84 percent of all sub-projects for which land was acquired. There were 46 sub-projects where land was acquired but no documentation was available (one IDLG sub-project and 45 MRRD-managed projects).

Engineers reported that the source of land acquired was mostly private (60 percent, n=170), community-owned (29 percent, n=84), or a combination of the two (11 percent, n=30). Land was almost exclusively acquired through donation (99 percent, n=281), while in three cases land had been purchased, and in one case land had been transferred by the Government. Engineers also reported that 79 households had been affected by loss of land for 25 sub-projects because of land acquisition, and none reported having received compensation so far.

For sub-projects where land was acquired, social researchers also asked whether any people had been required to leave their homes for sub-project construction; no respondents said this had occurred. For sub-projects where land had been donated, social researchers asked if land had been donated voluntarily. Respondents indicated that land had not been donated voluntarily in five MRRD-managed sub-projects.

2.4.10 Community Participatory Monitoring / Grievance Handling Mechanism

More than two-thirds of phone respondents (70 percent, n=2,015) reported the availability of a CPM/GHM, with a substantially higher response from IDLG-managed sub-projects: 180 respondents from IDLG-managed sub-projects (89 percent) and 1,835 respondents from MRRD-managed sub-projects (68 percent).

As in previous reporting periods, CDC office-bearers and sub-committee members (81 percent, n=911) were more likely than other community members (63 percent, n=850) to report positively on this issue, and those from the poorer quartiles least likely (58 percent, n=145). Overall, in every respondent group, women were less likely than men to report that a CPM/GHM was available.

Out of 403 communities, there were 117 communities (15 with IDLG-managed sub-projects and 102 with MRRD-managed sub-projects) where all respondents agreed that a CPM/GHM was in place. However, there were 10 communities with MRRD-managed sub-projects for which all respondents agreed no CPM/GHM was in place.

Of those respondents who stated that a CPM/GHM was established, 1,494 (74 percent) said that a grievance handling focal point had been appointed: 81 percent (n=146) of respondents from IDLG-managed sub-projects and 73 percent (n=1,348) of respondents from MRRD-managed ones.

Social researchers reported that 91 percent of all communities (n=385) had a CPM/GHM for handling grievances. There were 34 communities (eight percent) without a CPM/GHM and for five communities the

situation was unclear. Out of the 385 communities reported to have a CPM/GHM, 20 were for sub-projects managed by IDLG and 365 for sub-projects managed by MRRD.

Of the 2,015 respondents stating that a CPM/GHM had been established for handling grievances, 19 percent (n=379) stated that grievances had been reported. Of these 379 respondents, 21 (six percent) came from 13 communities with IDLG-managed sub-projects and 358 (94 percent) from 171 communities with MRRD-managed ones.

Some of the 379 respondents reported more than one grievance. One of the 21 respondents from an IDLG-managed sub-project did not know what the grievance related to, while the other 20 respondents reported 25 grievances. Similarly, for MRRD-managed sub-projects, five respondents did not know what the grievance related to, while the other 353 respondents reported 493 grievances.

The most common grievances alleged corruption or fraud (39 percent, n=204), followed by theft (13 percent, n=67), staff privilege (10 percent, n=54), CDC mobilization and management (eight percent, n=42), and land acquisition (three percent, n=13). More than a quarter of grievances (27 percent, n=138) were categorized as 'Other'; most (80 percent, n=111) related to the sub-project, often covering technical issues such as construction design or delays, poor-quality construction materials, CDC performance, and unfulfilled expectations about sub-project benefits.

2.4.11 Gender

In Q3, most respondents from both IDLG- and MRRD-managed projects confirmed that their CDC included at least one woman, though, as in Q2, there is evidence to suggest women play a less active role on CDC sub-committees than their male counterparts. For example, a lower percentage of women reported that the CDC had conducted a process to define key community priorities, and that they had been consulted on the CDP than did their male counterparts. In Q3, there were marginal differences between responses from men and women as to whether participatory community activities had taken place. As in Q2, only a small proportion of grievances were reported by women.

More than two-thirds of respondents (70 percent, n=2,014) said their CDC had female members. This figure was significantly higher for respondents from IDLG-managed sub-projects (88 percent, n=178) compared to respondents from MRRD-managed ones (68 percent, n=1,836). Similarly, a higher percentage of women (75 percent, n=273) reported their CDC had female members than men (69 percent, n=1,741). There were 25 communities with MRRD-managed sub-projects where every respondent agreed there were no female CDC members, but none among IDLG-managed ones.

Most female CDC office-bearers or sub-committee members (85 percent, n=141) said they had received training on their roles and responsibilities, a slightly lower percentage compared to their male counterparts (89 percent, n=859), in line with findings from previous reports. More than two-thirds of respondents (70 percent, n=2,014) said their CDC had female members. This figure was significantly higher for respondents from IDLG-managed sub-projects (88 percent, n=178) compared to respondents from

MRRD-managed sub-projects (68 percent, n= 1,836). Similarly, a higher percentage of women (75 percent, n=273) reported that the CDC had female members than men (69 percent, n=1,741).

There were 180 out of 403 communities (45 percent) where every respondent reported their CDC contained at least one female member. This comprised 22 out of 27 communities (81 percent) with IDLG-managed sub-projects and 158 out of 376 communities (42 percent) with MRRD-managed sub-projects. There were 25 communities with MRRD-managed sub-projects where every respondent agreed there were no female CDC members, but none among IDLG-managed sub-projects.

Social researchers reported that, in 338 out of the 489 sub-projects visited (69 percent), both women who were CDC office-bearers or sub-committee members and other female community members had been consulted during sub-project implementation. Women who were not CDC office-bearers or sub-committee members were consulted much more frequently in IDLG-managed sub-projects (94 percent, n=32) than MRRD-managed sub-projects (67 percent, n=306). Social researchers reported that, for two IDLG-managed sub-projects (six percent) and 147 MRRD-managed sub-projects (32 percent), only women who were CDC office-bearers or sub-committee members had been consulted during sub-project implementation.

In terms of social mobilization activities, on average, 75 percent of all women reported that community consultation activities had taken place compared to 70 percent of men (the difference largely stemming from reporting on Women's Mobility Mapping, where 74 percent of women said it had taken place compared to 60 percent of men). For the Leaking Pot Analysis, the share of women reporting the activity as having taken place (78 percent, n=283) was slightly higher compared to men (71 percent, n=1,789). There were no major differences in the shares of men and women reporting benefits from the different activities.

Across all respondent types, a slightly greater proportion of men reported knowing whether a CPM/GHM was available compared to women, with a ten-percentage point difference between male and female CDC office-bearers and sub-committee members, a nine-percentage point difference between male and female ordinary community members, and an 11-percentage point difference between male and female community members from the poorer quartiles. Almost three-quarters of CDC office-bearers or sub-committee members who reported that there was a CPM/GHM stated that it included female members (73 percent, n=664), a proportion that was slightly higher for IDLG-managed sub-projects (77 percent, n=59) compared to MRRD-managed ones (73 percent, n=605). The proportion of female CDC office-bearers or sub-committee members reporting this (76 percent, n=90) was slightly higher than for male CDC office-bearers or sub-committee members (72 percent, n=574).

In Q3, of the 379 people who said that grievances had been reported in their community, 37 (10 percent) were women, representing 31 communities. Four grievances related to IDLG-managed sub-projects and 33 to MRRD-managed ones. Three women did not know what the grievance related to, while the grievances reported by the other 34 related to 39 grievances, eight percent of all grievances in this reporting period. In all, 14 complaints related to alleged corruption or fraud (36 percent), 13 to 'other' grievances related to the sub-project (33 percent), three each to staff privilege (eight percent) and theft (eight percent),

two to CDC mobilization or management (five percent), and four to ‘other’ grievances not related to the sub-project (10 percent).

2.4.12 Insecurity

Security incidents were reported at eight MRRD-managed sub-projects: two in Logar, one in Nangarhar, one in Balkh, and four in Helmand. Landmines were reported as present within one kilometer of the construction site at three MRRD-managed sub-projects. Engineers reported that 21 out of 34 IDLG-managed sub-projects (62 percent) had a landmine form available. Similarly, 360 out of 456 MRRD-managed sub-projects (79 percent) had a landmine form available, and the form was reported to be available elsewhere for an additional eight (two percent).

2.4.13 Overall Assessment

The 490 sub-projects monitored by our engineers and assessed as Completed, Ongoing, or Suspended in Q3 were scored and rated as follows:

- Five sub-projects (one percent) were rated Very Good
- 343 sub-projects (70 percent) were rated Good
- 112 sub-projects (23 percent) were rated Average
- 29 sub-projects (six percent) were rated Below Average
- One sub-project was rated Poor.¹⁹

Based on the sub-projects monitored in this reporting period, we assess CCAP’s performance as **Good**.

¹⁹ The main issues were a weak O&M Plan, quality of materials used, and quality of workmanship.

2.5 EDUCATION QUALITY REFORM IN AFGHANISTAN

In Q3, in addition to a desk-based review of CDC financial information, engineers conducted in-person site visits to 134 sub-projects in 14 provinces undertaken by 134 CDCs. Overall, 109 sub-projects (81 percent) were implemented by CDCs and 25 (19 percent) by contractors. Call center staff conducted 804 phone interviews, of which 242 were with CDC office-bearers, 181 with members of Education Sub-Committees, and 381 with non-CDC respondents (parents from the lower quartiles).²⁰ Social researchers also conducted 133 in-person visits and photographed documentation provided by CDC office-bearers.²¹

2.5.1 Deviations

Our engineers identified six Critical, 107 Major, and 125 Minor deviations. Critical deviations related to the selected site being vulnerable to landslides and without appropriate protective measures in place or planned. Major deviations were attributed to similar issues, including vulnerability to earthquakes and flooding, not keeping to the required design specifications for well depth, poor workmanship when pouring concrete for buildings and ring beams, and no commode and missing or improperly constructed ramps for students with disabilities.

Table 21: EQRA Deviations in Q3 2021

	CRITICAL	MAJOR	MINOR	TOTAL
Deviations identified in Q3	6	107	125	238
Estimated rectification cost (USD)	4,965	83,933	14,335	103,233
Fully rectified in Q3	8	55	130	193
Non-rectifiable	15	130	73	218
Open at the end of Q3	44	235	383	662

In all, 26 percent (n=35) of sub-projects had no deviations and 16 percent (n=22) of sub-projects had only one Minor deviation. In Q3, 43 percent (n=57) had no deviations or only one Minor deviation (compared to 58 percent of sites monitored in Q2). During Q3, 193 open EQRA deviations were rectified: eight Critical deviations, 55 Major deviations, and 130 Minor deviations. As of the end of the reporting period, there were 662 open deviations: 44 Critical, Major (35 percent, n=235), and 383 Minor (58 percent).

Table 22: EQRA Deviations by Aspect Identified in Q3 2021

	CRITICAL	MAJOR	MINOR	TOTAL
Project Management	6	63	78	147
Materials	0	17	37	54
Workmanship	0	17	8	25
Design	0	10	2	12

²⁰ Call center staff could not collect data for four sub-projects due to communication line issues (Sub-Project IDs: 25-2502-M0084-5-a, 25-2502-M0092-5-a, 25-2503-M0042-5-a and 32-3205-M0099-5-a).

²¹ In Karatash CDC, Arghandab district, Zabul, no CDC members were available for in-person interviews.

	CRITICAL	MAJOR	MINOR	TOTAL
O&M	0	0	0	0
Social Safeguards	0	0	0	0
Environmental Safeguards	0	0	0	0
	6	107	125	238

2.5.2 Financial Review

We identified three cases of misalignment between financial and physical progress (instances where the sum of financial progress made exceeded the assessed physical progress by more than 15 percentage points), totaling USD 33,545. The estimated cost of rectifying deviations in Q3 amounted to USD 103,233.

2.5.3 Sub-Project Status

Of 134 visits to the 134 sub-projects, 95 visits were for new school construction and 39 for the provision of missing components such as the construction of boundary walls (n=25), latrine blocks (n=8), additional classrooms (n=4), and water wells (n=2).

2.5.4 Good Practice and Extra Works

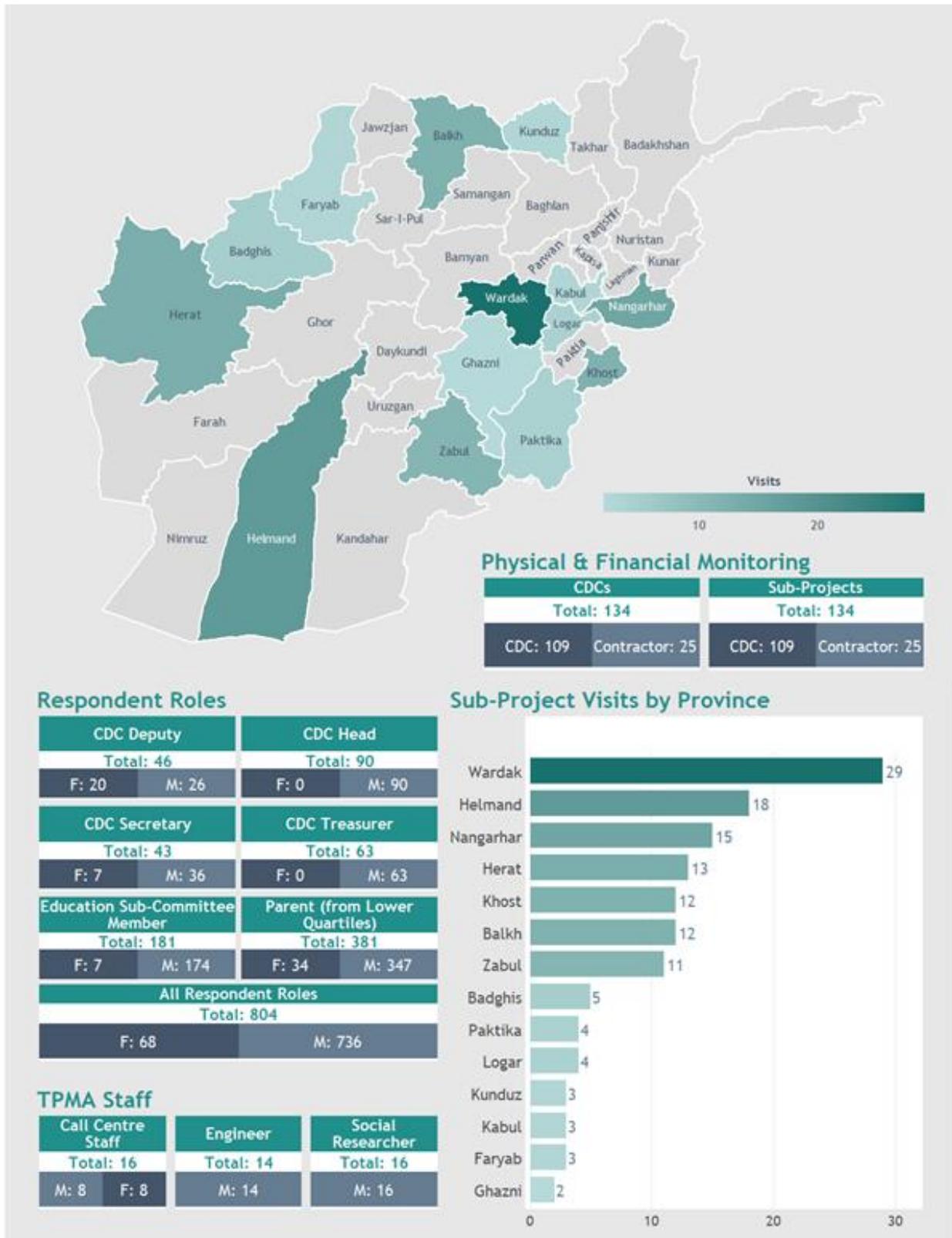
Our engineers recorded no examples of Good Practice in this period, but 12 examples of Extra Works in eight sub-projects: three in Kabul, two in Khost, and one each in Herat, Logar, and Wardak. All except one were in sub-projects managed by CDCs and most examples related to additional or enhanced work, such as upgrading local toilets to flush toilets, extending water facilities, and extending protective walls.

2.5.5 Community Engagement

From 130 CDCs, 774 respondents (96 percent) stated that the community had been consulted during sub-project planning, with all respondents from 114 CDCs agreeing that consultation had taken place. In all, 104 respondents (13 percent) in 46 communities stated that concerns had been raised at this stage, most involving fears about construction delays or failure to complete the sub-project (34 percent, n=35). Other concerns related to the quality of design or features (22 percent, n=23), sub-project location and land acquisition (20 percent, n=21), or insecurity and threats from the Taliban (10 percent, n=10).

EQRA guidelines encourage the establishment of a School Management Shura (SMS) to work with communities. All respondents from 102 sites visited (79 percent of total respondents) confirmed that an SMS had been established. When responses were limited to CDC and sub-committee members, all respondents from 113 sites confirmed that an SMS had been established. Of 36 respondents who reported that an SMS had not been established, 32 percent mentioned a lack of will or capacity on the part of teachers to establish one, and 47 percent their own lack of awareness about an SMS being established. Other reasons included the school not yet being operational or COVID-19 (11 percent). Three responses (eight percent) gave the Taliban or general insecurity as the reason for an SMS not being established.

Figure 6: Map of TPM Activities for EQRA in Q3 2021²²



²² This chart reflects the total number of individual CDCs and sub-projects covered by the Physical and Financial Monitoring heading, whereas the Sub-Project Visits by Province sub-chart reflects the total number of site visits conducted.

2.5.6 Disaster Risk

While most schools were not located in areas prone to flooding or landslide, of those that were, most did not have protective measures planned or in place.

Our engineers identified eight sub-projects (six percent) located at the bottom of steep slopes, with six of these (four percent) being at risk of landslides. All of these sub-projects required protective measures, such as a retaining wall or step-cutting, but four did not have them in place or planned. One Critical (as it was life threatening) and three Major deviations were reported at four of these six sub-projects due to the absence of protective measures against landslide risks. Our engineers identified nine sub-projects (seven percent) that were at risk from flooding. All required protective measures but only three sites had them in place.

2.5.7 Environment, Health and Safety Standards

Of the six sub-projects reporting that trees had been cut down, one had replanted 10 trees so far. All six sub-projects reported that trees would be replanted when sub-projects are completed, or when the planting season begins. Kunduz province reported the highest estimated number of trees cut down overall (n=130), followed by Wardak (n=40).

Our engineers reported that workers were wearing PPE at three of the eight ongoing sub-projects they assessed but no sites had First Aid kits available. There were five reports from community members of construction-related injuries to students across four sub-project sites. These injuries were minor, and the students had recovered. Twenty-seven respondents reported minor injuries to workers at 15 sites, caused either by workers falling on the site or materials falling on them while they were working. In addition to minor injuries, there were some reports of more serious injuries to workers at two sites, although they did not require hospitalization.

2.5.8 Insecurity

The number of references to insecurity and the Taliban made by stakeholders declined in Q3 by six percent relative to the previous quarter. In Q3, there were a total of 166 references to insecurity and the Taliban; 112 of these references were made during interviews of community respondents and 54 during engineers' site visits. These references were made at 58 different sub-projects; in most sub-projects more than one reference to insecurity was made. The sub-projects were dispersed around in 33 districts across 11 provinces. The references touched on a range of security related topics (36 in all).

Of the 166 Taliban references this quarter, 68 were references to Taliban interference with the project; 38 were general references to insecurity, fear of the Taliban, or Taliban control of an area; and 31 related to restrictions on education. There were 12 references in four provinces to the Taliban handling grievances in the absence of a GHC.

Community members reported to our engineers that there was fighting between Government forces and the Taliban at/around four sites, one of which was under Taliban control, but this had not affected or changed the membership of the CDC. This fighting reportedly damaged one sub-project site being used by the Taliban as a base (Ahq Tapa CDC, Char Bolak district, Balkh province) but the damage was assessed as repairable, at a cost of AFN 23,600. At two sites, one controlled by the Taliban and one contested, our engineers experienced no issues when taking pictures and GPS coordinates of the construction site, and they completed their monitoring visits successfully at all four sites where fighting was occurring nearby.

The number of references to Taliban-associated actors demanding a share of the sub-project budget, and the number of sub-project locations at which such reports were made, declined in Q3. Taliban actors reportedly demanded a share of the sub-project budget at two sites in Q3 (according to seven reports). In Q2, Taliban actors reportedly made demands at nine sites (according to 17 reports). Six of the reports about Taliban demands for payment in Q3 were made at Awal Khil village, Nerkh district, Wardak province. However, evidence of whether a payment had been made was unclear, three of the six reports indicated (but did not confirm) that a payment had been made and there was a single report that a demand for payment had been made and met, at Balihay Qul Ghafoor CDC, Kushk-E-Kuhna district, Herat province.

2.5.9 Grievance Redress Mechanism

Of 134 sub-projects visited, we found that 238 CDC office-bearers and Education Sub-Committee members at 80 of these sites reported a GHC had been established. When all types of respondents were asked whether a GHC had been established, respondents from 62 sites agreed that this was the case. In all, 546 respondents (68 percent) agreed that a GHC had been established, with 168 disagreeing (21 percent); the remainder did not know.

Respondents at 29 sites in 14 provinces reported that an estimated 122 grievances had been raised in total. The most common methods stated for reporting a grievance were speaking directly to a GHC member (49 percent), use of a complaints box (20 percent), writing to the GHC (15 percent), and phone call (11 percent). Where a GHC was not present (n=168), 37 percent of responses identified a local government office or official as responsible for grievance handling, whereas 44 percent named CDCs, SMSs, teachers, or community leaders. In all, 14 percent of respondents either did not have a grievance or could not name a grievance mechanism available to them. Nine respondents from seven sites said they would take up a grievance with the Taliban.

2.5.10 Gender

Consistent with previous reporting, a large majority of respondents said that the school location was suitable for boys and girls, with all respondents from 121 sites (93 percent of all respondents, n=746) agreeing the school's location was suitable for boys, and from 103 sites (80 percent of all respondents, n=642) that it was suitable for girls. Where respondents disagreed, the reasons included disapproval of co-

education or girls' education, the Taliban or insecurity, distance between the school and community, and a lack of facilities.

Of 44 co-educational and girls' secondary and high schools where boundary walls were required, 16 (36 percent) had them. Of the 28 schools without an existing boundary wall, 24 had one included in the sub-project contract but construction had not started at the time of the site visit.

In 57 communities, every respondent agreed that women had been consulted during the planning and implementation phases of sub-projects. Documented evidence of this was found at 16 sites. In 20 communities, mainly in Wardak, there were no reports of any women being consulted at the planning and implementation phase of sub-projects.

In 50 out of 113 communities with an established SMS, every community respondent reported that their SMS did not contain women members. However, when only CDC and Education Sub-Committee members were asked, an additional four communities agreed that their SMS did not contain women.

2.5.11 Overall Assessment

Of the 133 sub-projects that received ratings, engineers rated one sub-project as Very Good, 66 as Good, 50 as Average, 13 as Below Average, and three as Very Poor. The overall rating for EQRA sub-projects monitored in this period is **Good**.

2.6 TRANS-HINDUKUSH ROAD CONNECTIVITY PROJECT

Financing for the Trans-Hindukush Road Connectivity Project was provided solely by the International Development Association (IDA); it did not receive ARTF funding. TPMA monitoring data are provided here for general information. In Q3, we undertook a total of 22 in-person monitoring visits to 17 four-kilometer stations in three road segments. Segments are road portions of the project, which are divided into smaller Stations. Stations are the further breakdown of Segments. Each Segment is divided up into six Stations:

- Six visits to Segment One in Doshi district, Baghlan.
- Six visits to Segment Two in Doshi district, Baghlan.
- Ten visits to Segment Five in Shiber district, Bamyan.

Ministry of Public Works (MoPW) engineers or project staff accompanied our staff during all site visits.

2.6.1 Deviations

Out of 330 Observations made during Q3, we identified 47 deviations, including 35 Major and 10 Minor deviations. Two Critical deviations were identified during this monitoring period relating to project management. Deviations were most frequently found in relation to reinforced cement concrete (RCC) pipe culverts and stone masonry retaining walls (eight for each).

Table 23: THRCP Deviations in Q3 2021

	CRITICAL	MAJOR	MINOR	TOTAL
Deviations identified in Q3	2	35	10	47
Estimated rectification cost (USD)	600	18,940	980	20,520
Fully rectified in Q3	0	12	6	18
Non-rectifiable	0	1	2	3
Open at the end of Q3	8	228	148	384

Work in Baghlan accounted for three-fifths (n=28, 60 percent) of deviations, which was to be expected since two segments were visited in this province and only one segment in Bamyan. Segment Five in Bamyan accounted for the highest total number of deviations (n=19, 40 percent), the highest number of Major deviations (n=16, 34 percent), and both Critical deviations identified during the reporting period.

Table 24: THRCP Deviations by Aspect Identified in Q3 2021

	CRITICAL	MAJOR	MINOR	TOTAL
Project Management	2	11	3	16
Social Safeguards	0	11	1	12
Materials	0	6	2	8

	CRITICAL	MAJOR	MINOR	TOTAL
Workmanship	0	3	4	7
Environmental Safeguards	0	3	0	3
Design	0	1	0	1
	2	35	10	47

2.6.2 Financial Review

The estimated cost of rectifying deviations in this period amounted to USD 20,520.

2.6.3 Segment Status

Our engineer visited six stations of Segment One in July and found work suspended at three stations. Our engineer visited six stations of Segment Two in August and found work suspended at two stations, no work yet started at one station (reported as ‘No Activity’), and work at all others ongoing. For Segment Five, our engineer visited five stations in August and found work ongoing at four stations and suspended at one. Across all three segments, insufficient project management by the contractor, insecurity, and lack of budget for project implementation due to contractors’ invoices not being processed or paid on time were the primary reasons given for suspension.

2.6.4 Good Practice

We did not identify any examples of Good Practice in Q3.

2.6.5 Contractor Performance

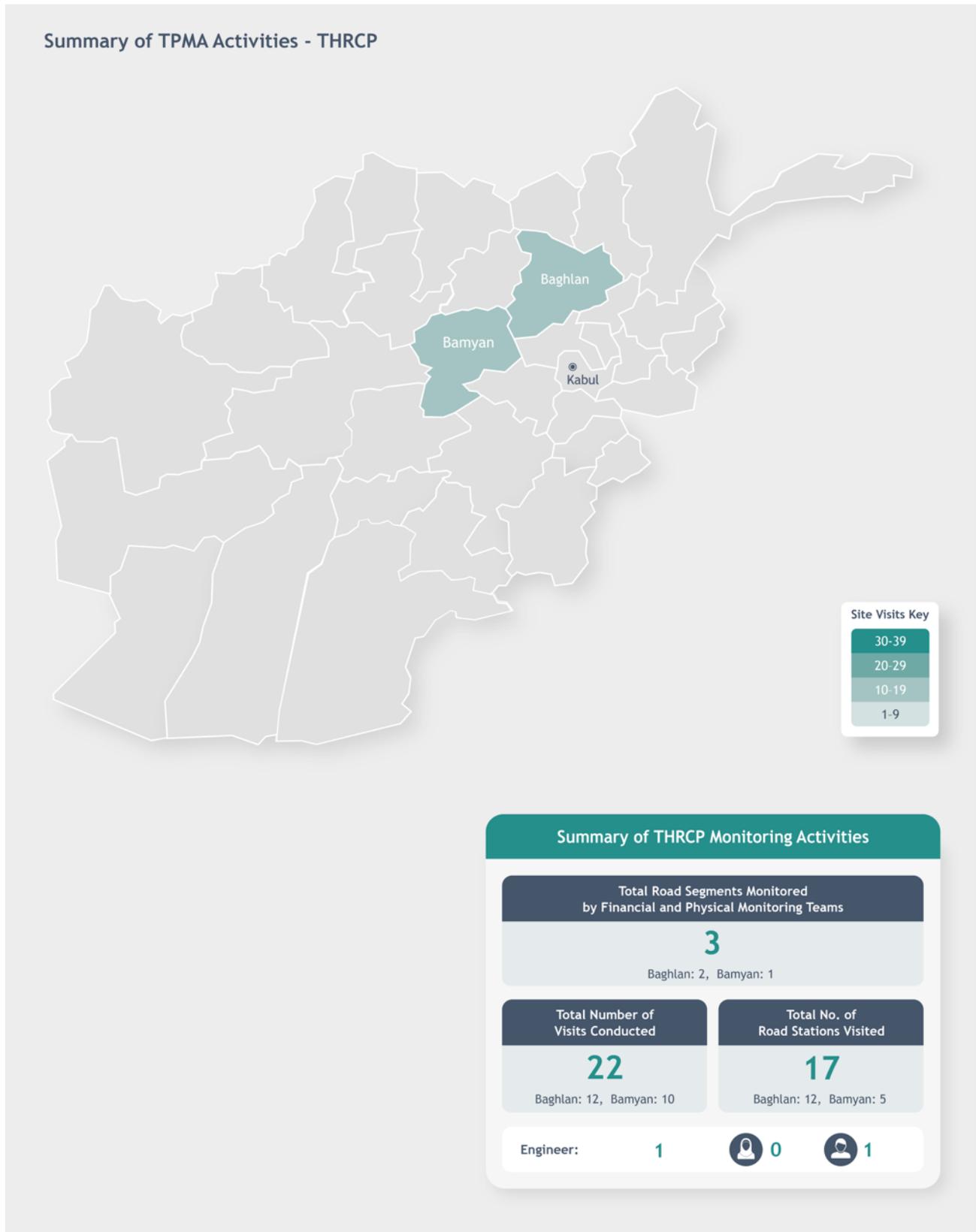
During their site visits, our engineer found workers active on site at most of the stations where work was categorized as Ongoing. The contractors’ project managers were on site during all the monitoring visits at all three segments. A Quality Control Manager and Land Survey Manager were on site at ongoing stations of Segments Five and Two but not Segment One. Our engineer found that the contractors in all segments were not paying workers’ salaries and suppliers on time, mostly stated to be because of the late disbursement of funds.

During site visits, our engineer observed that construction materials were well stocked or protected against theft, mishandling, or bad weather in Segments Two and Five but not in Segment One. Our engineer also observed that the contractor had conducted materials testing as per the contract requirements in all ongoing segments, the most common of which included concrete compressive strength tests and field density tests. However, although materials tests had been conducted in all segments, the test results were not available in some stations in all segments.

During Q3 2021, the Segment One contractor conducted a combination of 67 tests, passing 61; the Segment Two contractor conducted 15 material tests and passed all 15; and the Segment Five contractor conducted 70 material tests, passing 68.

Most required documentation was available for inspection and appropriately stored.

Figure 7: Map of TPM Activities for THRCP in Q3 2021



2.6.6 Environmental and Social Safeguards

ESMPs were available in all segments except Segment Five. In Segment One, the ESMP was not on site but stated to be available elsewhere. Our engineers identified soil pollution in all segments arising from dust pollution, attributed to the absence of a dust control plan and water tankers on site for spraying and the volume of traffic.

In all three segments, our engineers noted that sand or gravel had been removed from riverbeds, although this was only considered to have negatively impacted river morphology in Segment Five. No contractor in any segment had written permission to do so.

Both productive and non-productive trees²³ had been cut down during road construction in all segments since the project's inception, but the availability of data regarding the types and numbers of trees varied. There was no record for Segment One of the type and number of trees cut down. For Segment Two, the Construction Supervision Unit reported that 43 trees had been cut down, while the contractor had cut 6,090 trees in Segment Five. For both segments, the exact balance between productive and non-productive trees cut down was unknown and plans for future cutting were also unavailable at the site. While no trees had been replanted to date, all three segments were stated to have plans for post-completion replanting.

2.6.7 Health and Safety

First Aid kits were not available at any of the stations in Segments One and Five. In Segment Two, two stations provided First Aid kits while four did not. PPE had been provided to workers at one station each in Segments Two and Five but not at any stations in Segment One. Safety training for workers had been provided in three stations of Segment Two and one station of Segment One, but in none of the stations of Segment Five.

2.6.8 Land Acquisition

No land was acquired for the project during this reporting period. However, in the past the sub-projects had acquired a total of 300,174 square meters of land across the three monitored segments, affecting 464 households and 96 businesses. Most land had been acquired through sub-project purchases from the owners, evidenced by land transfer documentation at the site. Contractors observed that affected households in Segment One and Segment Five had received compensation and that, in Segment Two, compensation for affected households was in progress. The monitoring team found that for all segments there was no clear compensation plan for affected businesses.

²³ Productive trees are fruit trees, typically apple, pear, apricot, and vine. Non-productive trees are non-fruit trees, typically sycamore and willow.

2.6.9 Overall Assessment

The three Segments monitored by our engineers were scored and rated as follows:

- The rating for Segment One in Baghlan was Average.
- The rating for Segment Two was Average. In Segment Two, a rating was not applied to Station 44+000 - 47+040 during the whole quarter because no work had taken place.
- The rating for Segment Five in Bamyan was Below Average.

The overall rating for THRCPC road segments monitored in Q3 2021 is **Average**.

3 RESULTS FROM FINANCIAL MONITORING

3.1 STATEMENT OF EXPENDITURE REVIEWS

This report contains the results of our reviews of SoEs submitted by Project Management Units (PMUs) and details of the SoE Cover Letters ('Certificates') issued in Q3 2021 (between 1 July 2021 and 30 September 2021), in respect of the Afghan Government's Financial Year 1399 and 1400, corresponding to the period 22 December 2019 to 21 December 2020, and 22 December 2020 to 21 June 2021, respectively.

Table 25: Statement of Expenditure Review Results (USD)

	Q1 2021	Q2 2021	Q3 2021	2021 Total	Cumulative to Date
SoE Cover Letters issued	29	49	35	113	187
Amount claimed for replenishment (USD)	83,415,268	205,139,973	99,132,722	387,687,963	513,830,828
Net adjustments proposed by TPMA (USD)	-4,617,107	-1,830,269	146,477	-6,300,899	-18,080,867
Amount recommended for replenishment (USD)	78,798,161	203,309,704	99,279,199	381,387,064	495,749,961
Sample value (USD)	51,780,621	88,907,959	67,786,214	208,474,794	283,482,386
Sample coverage	62 percent	43 percent	68 percent	54 percent	55 percent

During Q3 2021, we issued 35 SoE cover letters for 20 projects claiming a total of USD 99,132,722 for replenishment from the Bank. We sampled USD 67,786,214 (68 percent) of this amount, proposed adjustments in respect of questionable transactions (net of reversals) totaling USD 146,477 and recommended USD 99,279,199 for replenishment.

Since January 2020, we have issued 187 cover letters for expenditure claims amounting to USD 513,830,828, 55 percent of which were sampled during our reviews.

We also reported on internal control weaknesses identified during our SoE reviews. These primarily related to non-compliance with procurement and financial policies, and disclosure errors in the submitted SoEs. We made recommendations to projects on how the identified weaknesses and risks should be addressed to support a strengthened control environment.

Where adjustments are proposed, these normally arise from non-compliance with applicable procurement regulations and the late submission of the documentation (including copies of relevant authorizations) needed to allow reimbursement to occur. In most cases, this documentation is submitted as part of a later SoE, thus allowing replenishment to proceed.

3.1.1 Questionable Transactions

Since January 2020, we have identified USD 18,080,867 of Questionable Transactions during regular SOE reviews. To minimize the risk of ineligible expenditure, payments identified as Questionable Transactions are withheld until issues are resolved and/or missing documentation provided. Missing documentation has been provided for USD 11,979,117 of Questionable Transactions and the issues have been resolved as summarized below, with USD 6,101,750 requiring further documentation to be eligible for reimbursement.

Table 26: Status of Questionable Transactions (Cumulative to Date)

	USD
Cumulative Adjustments for Questionable Transactions	18,080,867
Resolved	(11,979,117)
Unresolved Questionable Transactions	6,101,750

For detailed analysis by project, please see Annex 3. The main reasons for the unresolved Questionable Transactions are summarized below.

Table 27: Reasons for Cumulative Unresolved Questionable Transactions

	USD
Non-compliance with applicable procurement regulations	1,900,515
Missing supporting documentation	2,317,024
Overdue advances claimed as expenditure	596,264
Non-compliance with financial policies	1,098,243
Accounting/Casting errors	0
Overpayments to contractors and employees	153,770
Others	35,934
	6,101,750

The highest value unresolved questionable transactions reported in submitted SoEs, shown below, account for approximately 77 percent (USD 4,700,820) of this total.

Table 28: Highest Value Unresolved Questionable Transactions as of the end of Q3 2021

PROJECT ID	PROJECT	PERIOD	USD
P160567	CCAP (MRRD) OpEx	Q2 1399	1,153,659
P160568	CCAP (IDLG) OpEx	Q3 & Q4 1399	1,082,754
P160615	Sehatmandi	Q3 & Q4 1399	976,451
P160615	Sehatmandi	Q1 & Q2 1399	276,109
P160567	CCAP COVID 19 Relief Grants Lot 4	Q2 1400	266,466
P164762	ALASP	Q3 & Q4 1399	252,469
P162022	HEP	Q2 1399	197,914
P160568	CCAP (IDLG) OpEx	Q2 1399	194,116

PROJECT ID	PROJECT	PERIOD	USD
P164443	Women's Economic Empowerment Rural Development Project	Q4 1399	151,405
P160567	CCAP (MRRD) OpEx	Q3 1399	149,477
			4,700,820

3.2 INTERNAL CONTROL ASSESSMENTS

We reported on the ICA for TAGHIR this quarter. The objective of our assessment was to evaluate the adequacy and effectiveness of governance, risk management, and control processes intended to ensure the effective management of project funds. It should be noted that these assessments are not an internal or external audit, nor are they conducted in line with International Standards on Auditing. Consequently, we are not providing assurance.

We reviewed the design and operating effectiveness of 102 key controls and found 36 exceptions. Based on the limited scope of our Terms of Reference, our overall assessment of internal controls over TAGHIR project funds is that of a 'Significant Deficiency', as summarized below. In positive terms, we found that the evaluation of the LMAs (Line Ministries and Independent Agencies), though not completed, had been progressing well with the biometric registration and data capture of the civil servants rolled out in almost all LMAs including in provincial offices. Also, in Financial Management, we noted that the Interim Un-Audited Financial Reports were properly prepared and submitted in a timely manner.

Table 29: Overall Assessment of Internal Controls (TAGHIR)

AREA	CONTROLS TESTED	EXCEPTIONS IDENTIFIED	ASSESSMENT
Governance and Control Environment	17	6	Significant Deficiency
Financial Management	29	8	Deficiency
Procurement and Contract Management	12	5	Deficiency
Assets and Inventory Management	11	5	Significant Deficiency
Recruitment and HRM	21	7	Significant Deficiency
Management of Priority LMAs	12	5	Deficiency
Overall Assessment	102	36	Significant Deficiency

Our analysis of the exceptions is provided in Table 30.

Table 30: Analysis of Exceptions (TAGHIR)

	DEFICIENCY	SIGNIFICANT DEFICIENCY	MATERIAL WEAKNESS	TOTAL
Governance and Control Environment	2	4	-	6
Financial Management	6	2	-	8
Procurement and Contract Management	3	2	-	5
Assets and Inventory Management	3	2	-	5
Recruitment and HRM	2	2	3	7
Management of Priority LMAs	3	2	-	5
	19	14	3	36

Our recommendations are detailed in Annex 4. We agreed a time-bound action plan with management for implementation of the recommendations. However, disbursements were paused effective 15 August, and we have not monitored progress since then. It is important to stress that the ICA exercises are designed to aid Bank task teams by identifying potential control weaknesses. By design, the ICAs only describe gaps or deficiencies; they do not document or rate the controls that are functioning as intended.

4 REFINING OUR APPROACH

Halfway through this quarter, on 15 August, the Taliban seized control in Kabul. Since then, we have worked with the World Bank Contract Managers, Practice Groups, and project task teams to identify and plan to address critical information gaps, building on our continuing in-country presence and ability to continue to conduct data collection.

4.1 ADAPTING OUR METHODOLOGY AND APPROACH

In discussion with the World Bank, we identified the Bank's principal information requirements in the absence of being able to obtain regular data through Government channels. We agreed with the World Bank Economics Team to undertake sector monitoring of key economic indicators from Q4 2021, including consumer price index information on a basket of primary goods. In addition, with the EQRA task team, we identified a sample of 100 completed schools that could not be monitored earlier in the year due to security-related access problems and adapted our data collection tools in response to the changed political environment.

We continue to engage with the World Bank over future TPM needs to the end of Q4 2021 and into 2022.

4.2 STAKEHOLDER ENGAGEMENT

In Q3, we continued the standard quarterly report feedback process involving obtaining feedback from each World Bank Task Team on reports issued. We also conducted feedback sessions with task teams and Government PIUs on previously issued reports, providing an opportunity to explore useful findings, identify information gaps, and review deviations found, and continued to support World Bank Implementation Support Missions.

Work with the IRDP project Task Team and PIU to support on the project's Internal Completion and Results Report, although begun in July 2021, could not be completed as a result of the collapse of the Government.

4.3 IMPROVEMENTS TO THE DIGITAL PLATFORM

In Q3, our Digital Platform Unit continued to conduct platform walk-throughs and refresher sessions with Government users to enable them to record and update information about deviations found and rectified. We also provided informal follow-up mentorship via email and Skype. In total, we conducted three

different demonstrations and training sessions on the use of our digital platform with three ministries and three Bank Task Teams. However, all Government personnel user accounts were suspended after 15 August, by agreement with the World Bank.

In addition, the team commenced the development of reporting systems for the new sector monitoring task in the form of a visual dashboard and datasets.

Table 31: Digital Platform Training

ENTITY	PROJECT	TRAINING DATE
MoE ISD	EQRA	June 2021
IDLG	CCAP	July 2021
MoHE	HEDP	August 2021

ANNEX 1: INFRASTRUCTURE SCORING AND RATING

Initial Scoring and Rating

DEFINITION	INITIAL SCORE	INITIAL RATING
Design		
The design was created with full consideration of the site requirements. The design is fully appropriate and allows for 100 percent of intended functionality and design life.	5	Very Good
The design responds to almost all site requirements; however, small considerations could have reduced wear and tear and lowered maintenance requirements. Intended functionality is between 90 percent and 100 percent and design life is not impacted.	4.0 - 4.9	Good
The design responds only to the major requirements of the site. Some of the design may be inappropriate or missing important elements, causing the sub-project to have between 70 percent and 90 percent of intended functionality and a shorter design life.	3.0 - 3.9	Average
The design does not respond to all major requirements of the site. Much of the design may be inappropriate or missing important elements, severely lowering functionality to between 40 percent and 70 percent. Sustainability is negatively impacted, and the sub-project will require more maintenance than otherwise would be necessary.	2.0 - 2.9	Below Average
The design responds only to a minority of the major requirements of the site. The design may be largely inappropriate or missing important elements, making the sub-project unsustainable and non-functional in a number of identifiable areas (between 10 and 40 percent). Portions of the design may have not been feasibly implemented.	1.0 - 1.9	Poor
The design does not consider any of the major requirements of the site. The design is inappropriate, making the sub-project unsustainable and non-functional (below 10 percent). Identified deficiencies cannot be remedied without affecting the sub-project budget or timeframe and may not be capable of rectification.	0.0 - 0.9	Very Poor
Materials		
The materials used meet all the technical specifications and exceed them in some areas.	5	Very Good
The materials used meet all the technical specifications.	4.0 - 4.9	Good
The materials used meet the major specifications, with some evident deficiencies that can be remedied without affecting the sub-project budget or timeframe.	3.0 - 3.9	Average
The materials used deviate from the technical specifications, with a number of evident deficiencies that can be remedied but are likely to affect the sub-project budget or timeframe.	2.0 - 2.9	Below Average
Many of the materials used deviate from the technical specifications, with many evident deficiencies that cannot be remedied without affecting the sub-project budget or timeframe.	1.0 - 1.9	Poor

DEFINITION	INITIAL SCORE	INITIAL RATING
All, or almost all of the materials used deviate from the technical specifications requiring serious reworking, up to and including complete replacement. Identified deficiencies cannot be remedied without affecting the sub-project budget or timeframe and may not be capable of rectification.	0.0 - 0.9	Very Poor
Workmanship		
The quality of workmanship meets all the technical specifications and exceeds them in some areas.	5	Very Good
The quality of workmanship meets all the technical specifications.	4.0 - 4.9	Good
The quality of workmanship meets the major specifications, with some evident deficiencies that can be remedied without affecting the sub-project budget or timeframe.	3.0 - 3.9	Average
The quality of workmanship meets the technical specifications, with a number of evident deficiencies that can be remedied but are likely to affect the sub-project budget or timeframe.	2.0 - 2.9	Below Average
The workmanship quality deviates significantly from the technical specifications, with many evident deficiencies that cannot be remedied without affecting the sub-project budget or timeframe.	1.0 - 1.9	Poor
In all, or almost all cases, the quality of workmanship deviates from the technical specifications requiring serious reworking, up to and including complete replacement. Identified deficiencies cannot be remedied without affecting the sub-project budget or timeframe and may not be capable of rectification.	0.0 - 0.9	Very Poor
Operations and Maintenance (applicable to Completed sub-projects)		
The O&M Plan is fully funded and being implemented. It meets all the requirements of the site or sub-project, exceeds it in some identifiable areas, and is expected to be sustainable over the entire design life of the sub-project.	5	Very Good
The O&M Plan meets all the requirements of the site or sub-project and fully funded. If not already being implemented, it is expected to be fully funded and to be sustainable over the entire design life.	4.0 - 4.9	Good
The O&M Plan meets the major requirements of the site or sub-project. The majority of funds needed are in place to support implementation.	3.0 - 3.9	Average
The O&M Plan meets some but not all of the major requirements of the site or sub-project. A minority of the funds needed to support implementation are in place. If not already being implemented the Plan is not expected to be fully funded.	2.0 - 2.9	Below Average
The O&M Plan meets very few of the major requirements of the site or sub-project.	1.0 - 1.9	Poor
The O&M Plan does not support or is likely to fail to support the sustainability of the site or sub-project.	0.0 - 0.9	Very Poor

Deviation Definitions

CATEGORIES	DEFINITION
Critical	Failure to construct infrastructure in a way that protects workers or community members during construction and requiring urgent mitigation before work can continue.
	For completed infrastructure, failure to construct infrastructure in a way that protects community members or users.
	A non-recoverable negative impact in terms of structural quality, functionality or sustainability.

CATEGORIES	DEFINITION
Major	Capable of being rectified but not within existing budget and/or timeframe for completion. A significant negative impact in terms of overall structural quality, functionality and/or sustainability. Not capable of being rectified and resulting in agreed budget and timeframe for completion being exceeded.
Minor	Capable of being rectified within existing budget and/or timeframe for completion. No significant negative impact in terms of overall structural quality, functionality and/or sustainability. Not capable of being rectified but no negative effect on agreed budget and timeframe for completion.
Notification	Minor deviations identified with an estimated rectification cost of under USD 50 are treated as Notifications, listed and supplied to the Government project team for resolution.

Scoring and Final Rating

A final sub-project rating takes into account the number and nature of deviations identified as well as evidence of Good Practice. For reporting at project level, the average of final ratings for all sub-projects monitored in each reporting period is taken.

SCORE	DEVIATIONS	FINAL RATING
5.00	No deviations	Very Good
	Not more than 4 Minor deviations	Good
3.00-4.99	No Critical deviations	Good
	1 Critical deviation	Below Average
	More than 1 Critical deviation	Poor
	Not more than 2 Major deviations	Good
	Not more than 5 Major deviations	Average
	More than 5 Major deviations	Below Average
	Not more than 4 Minor deviations	Good
	Not more than 10 Minor deviations	Average
	More than 10 Minor deviations	Below Average
	2.00-2.99	No Critical deviations
1 Critical deviation		Poor
More than 1 Critical deviation		Very Poor
Not more than 2 Major deviations		Below Average
More than 2 Major deviations		Poor
0.00-1.99	Not more than 4 Minor deviations	Below Average
	More than 4 Minor deviations	Poor
	Not more than 1 Critical deviation, not more than 5 Major deviations, or not more than 10 Minor deviations	Poor
	More than 1 Critical deviation, more than 5 Major deviations, or more than 10 Minor deviations	Very Poor

ANNEX 2: DEVIATIONS AND RECTIFICATIONS IN Q3 2021²⁴

CRITICAL			
	NEW	RECTIFIED	OPEN DEVIATIONS ²⁵
CASA CSP	1	0	1
CCAP	9	5	38
CIP	0	0	0
EQRA	6	8	44
THRCP	2	0	8
	18	13	91

MAJOR			
	NEW	RECTIFIED	OPEN DEVIATIONS
CASA CSP	6	0	6
CCAP	166	96	1,089
CIP	0	0	0
EQRA	107	55	235
THRCP	35	12	228
	314	163	1,558

MINOR			
	NEW	RECTIFIED	OPEN DEVIATIONS
CASA CSP	1	0	1
CCAP	124	69	918
CIP	0	0	0
EQRA	125	130	383
THRCP	10	6	148
	260	205	1,450

Total	592	381	3,099
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²⁴ This annex only presents figures from the five ongoing sub-projects which we monitored during Q3.

²⁵ Figures for open deviations are for the end of Q3 and reflect the agreed reclassification of deviations for CCAP and EQRA. They also do not include non-rectifiable deviations.

ANNEX 3: STATEMENTS OF EXPENDITURE ISSUED IN Q3 2021

PROJECT ID	PROJECT	PERIOD	TOTAL	ADJUSTMENTS	REVERSAL OF PREVIOUS QUARTER SOE	REPLENISHMENT (USD)
P128048	Access to Finance (A2F)	Q2 & Q3 1400	1,198,519	-	-	1,198,519
P172109	Afghanistan Gas Project (AGASP)	Q1 & Q2 1400	133,335	(750)	-	132,585
P125961	Afghanistan Rural Access Project (ARAP) (MoPW)	Q4 1399	5,751,571	3,071	307,841	6,062,483
P125961	ARAP (MoPW) Final	Q1 & Q2 1400	4,322,296	29	-	4,322,325
P125961	ARAP (MRRD) Final	Q1 & Q2 1400	1,084,532	-	-	1,084,532
P149410	CASA CSP (Grants)	Q2 1400	1,034,916	(65)	-	1,034,851
P149410	CASA CSP (OpEx)	Q2 1400	257,825	-	-	257,825
P149410	CASA CSP (COVID Relief Grant) Lot 2	Q2 1400	520,407	(4,516)	-	515,891
P160567	CCAP (MRRD) CDC Grant Lot 10	Q2 1400	15,709,701	(52,228)	-	15,657,473
P160567	CCAP (MRRD) CDC Grant Lot 11	Q3 1400	6,532,434	(24,816)	-	6,507,618
P160567	CCAP COVID 19 Relief Grants Lot 5	Q3 1400	1,635,895	(46,371)	-	1,589,524
P160567	CCAP (MRRD) OpEx.	Q2 1400	5,158,316	(145,450)	-	5,012,866
P173775	COVID-19 ERHPP	Q1 & Q2 1400	13,021,444	-	-	13,021,444
P156894	Digital CASA	Q1 & Q2 1400	148,684	-	-	148,684
P174348	Emergency Agriculture and Food Supply (EATS)	Q1 & Q2 1400	9,621,292	-	-	9,621,292
P159378	EQRA (MoE)	Q1 & Q2 1400	1,012,758	-	-	1,012,758
P166127	Eshteghal Zaiee - Karmondena - Kabul Municipality	Q1 & Q2 1400	402,888	-	-	402,888
P166127	EZ-Kar (MoEc)	Q1 & Q2 1400	460,749	-	-	460,749

PROJECT ID	PROJECT	PERIOD	TOTAL	ADJUSTMENTS	REVERSAL OF PREVIOUS QUARTER SOE	REPLENISHMENT (USD)
P166127	EZ-Kar (MoFA)	Q1 & Q2 1400	75,147	-	-	75,147
P159655	FSP	Q1 & Q2 1400	1,461,944	-	-	1,461,944
P146184	HEDP	Q2 1400	294,480	(1,472)	-	293,008
P122235	IRDP	Q1 & Q2 1400	5,371,951	-	(1,903,318)	3,468,633
P122235	IRDP - Final	Q1 & Q2 1400	3,053,182	(767)	-	3,052,415
P125597	KMDP	Q1 & Q2 1400	4,485,271	-	65,505	4,550,776
P143841	National Horticulture and Livestock Productivity Project (NHLP) Final	Q1 & Q2 1400	158,570	-	2,150,920	2,309,490
P168179	OMAID	Q1 & Q2 1399	12,940	-	-	12,940
P168179	OMAID	Q4 1399	77,570	(1,267)	-	76,303
P168266	PAISA (DAB)	Q1 & Q2 1400	32,106	-	-	32,106
P168266	PAISA (MoF)	Q1 & Q2 1400	9,498	-	-	9,498
P166978	TAGHIR	Q1 & Q2 1400	4,425,594	-	-	4,425,594
P145347	THRCP	Q1 & Q2 1400	1,172,325	(103,036)	-	1,069,289
P174119	REACH - IDLG (CDC) Lot 1	Q3 FY 1400	4,383,004	(2,352)	-	4,380,652
P174119	REACH - IDLG (CDC) Lot 2	Q3 FY 1400	365,971	(349)	-	365,622
P174119	REACH-MRRD (CDC) Lot 1	Q3 FY 1400	4,776,672	(94,132)	-	4,682,540
P174119	REACH-MRRD (CDC) Lot 2	Q3 FY 1400	968,935	-	-	968,935
			99,132,722	(474,471)	620,948	99,279,199

ANNEX 4: INTERNAL CONTROL ASSESSMENT RECOMMENDATIONS (TAGHIR)

PROJECT	SUMMARY OF FINDINGS
Governance and Control Environment	<ul style="list-style-type: none"> • Update the roles and responsibilities of the Board of Commissioners to align with the following requirements in the World Bank’s amended Grant Agreement: <ul style="list-style-type: none"> – “<i>Inter alia</i>, steering, monitoring, and evaluation of project implementation; as well as; – Providing overall strategic oversight of the project; – Reviewing and approving the strategic direction and allocation of project resources; – Overseeing the development and implementation of project guidelines and plans; – Adopting required decisions for better and timely project implementation; and – Approving civil servant staffing allocations for priority LMAs and non-priority LMAs”. • Conduct internal audits on a quarterly or bi-annual basis. • Provide a copy of the Anti-Corruption Guidelines to all representatives (employees, contractors, consultants, etc.) and sub-grant recipients.
Financial Management	<ul style="list-style-type: none"> • Establish a Budget Coordination Committee as required by the Financial Management Manual (FMM). • Perform monthly bank reconciliations. • Ensure payments are authorized in accordance with the approved delegation of authority. • Acquit advances within three months of return from travel or the receipt of funds and deduct overdue advances from staff’s salaries in accordance with the FMM. • Conduct unannounced cash counts. • Develop a formal mechanism and action plan to track and monitor implementation of internal and external audit recommendations.
Procurement and Contract Management	<ul style="list-style-type: none"> • Ensure use of the World Bank’s Standard Bidding Documents in procurement. • Ensure that Conflict of Interest declarations are submitted by Bid Opening and Purchasing Committee members. • Develop a contract management plan as a mechanism to track and monitor contract compliance and implementation.
Assets and Inventory Management	<ul style="list-style-type: none"> • In accordance with the FMM, “make arrangements to carry out physical verification of fixed assets at least once every year”. • Prepare a Weekly Fixed Asset Movement Report, insure and tag all fixed assets.
Recruitment and Human Resource Management	<ul style="list-style-type: none"> • We found evidence of unqualified candidates being shortlisted and recruited for positions at the PIU. To address this: <ul style="list-style-type: none"> – Management should revisit the recruitment processes for those positions and put in place a review mechanism to monitor and ensure compliance with the recruitment and selection policies. – Longlists should be reconciled to the depository of curricula vitae (CVs), and further checked for accuracy by reconciling (on a sample basis) the listed qualification and experience details to candidates’ CVs. • We reconciled the net amount paid to employees, as per the Form M41 (payroll records), to the bank reports that the project prepares and submits to the Ministry of Finance (MoF) which contains details of employees’ bank account numbers and

net salaries. We found differences amounting to AFN 1,140,521 and discrepancies in the bank account numbers of 86 employees. Management should provide explanations for these differences and ensure that details on the bank reports submitted to the MoF for processing are independently reconciled to the M41 prior to submission.

- We found discrepancies between payroll records and timesheets/attendance records, which indicated that some staff were paid for days not worked. Management should provide explanations for these differences and enhance existing payroll controls by ensuring monthly documented reconciliations of attendance records to the M41.
- Establish a recruitment plan and fast-track the recruitment process in order to fill existing vacancies.

Management of Priority LMAs

- Fast-track the Human Resources Management Information System (HRMIS) development and roll-out process by setting milestones and routinely reviewing its status to ensure timely completion of the HRMIS.
- To ensure compliance with performance benchmarks, consider developing a six-monthly workplan and prepare benchmark reports on a six-monthly rather than annual basis, following completion of each cycle of review in accordance with the Grant Agreement.
- Conduct a study to identify and address the bottlenecks and root causes for the slow implementation of the Strategic Staffing Plan.
- Expand scope of the Recruitment Quality Assurance (RQA) team to include the requirement to check that members of the shortlisting and recruitment panels submit Conflict of Interest declarations to confirm they are independent of candidates being considered for recruitment.
- The RQA team should, during reviews, consistently check that the shortlisting and interview processes are conducted by different panel members as per the Operations Manual.
- The RQA team should ensure that all complaints are properly documented, and that decisions reached are supported by documentary evidence.

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