

RISK ASSESSMENT AND RISK MANAGEMENT PLAN

Risk Description	Rating	Mitigation Measures	Responsibility
I. Technical			
Vaccines not allocated according to the prioritization plan.	H	(i) Strong oversight and coordination structure in place (ii) The MOPH to monitor compliance through a monitoring and evaluation database (iii) ADB will hire consultants to supplement coordination and surveillance	MOPH and ADB
Long vaccine lead times: high global demand far exceeds supply of approved vaccines.	H	(i) Risk transferred to UNICEF, a qualified procurement agent with purchasing and negotiating power (ii) UNICEF to also explore use of bilateral arrangements such as direct procurement of eligible vaccines from India or other appropriate sources	ADB, MOPH, and UNICEF
Security situation and high criminality affect delivery of vaccines.	H	(i) The MOPH to provide security personnel during the transit of vaccines (ii) UNICEF and government to use firms with proven logistics track record (iii) Low-profile approach with appropriate security measures.	ADB, MOPH and UNICEF
Insufficient on-the-ground arrangements for the delivery of vaccines to the population.	H	(i) Use of existing EPI centers with a proven track record in delivering vaccines supported by medical centers and 2,000 additional vaccinators (ii) Use of the SCO to support coordination, including monitoring of integrity risks and controls, and NGOs to support deployment.	ADB, MOPH, UNICEF, WHO, and the World Bank
Vaccines not delivered to difficult-to-reach places and areas controlled by the Taliban.	H	(i) 1,000 additional mobile teams supported by the Red Cross and NGOs (ii) The Taliban have expressed support for the vaccination process (iii) Special letters of guarantee and/or clearance to be provided by the Taliban.	ADB, MOPH, UNICEF, WHO, and the World Bank
Monitoring of adverse vaccine effects not effective.	H	(i) Training provided by UNICEF and WHO to the existing EPI centers and 2,000 additional vaccinators (1,000 mobile teams) (ii) Digital tracking systems will be used by the regional and provincial EPI monitoring teams to detect, report, and manage patients presenting adverse effects)	MOPH, UNICEF and WHO
Ineffective system for stock management and tracking of vaccines.	H	(i) Ensure that the MOPH and service providers fully utilize the VSSM tool established by WHO, and DHIS2 and HMIS up to the health facilities (ii) Monitoring cell to be established to monitor the vaccination process and develop a supervision plan for national, regional, and province managers.	MOPH, UNICEF and WHO
Vaccine theft and misappropriation.	H	Standard operating procedures for storekeepers with an established accountability and transparency framework.	MOPH and development partners

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Insufficient temperature-controlled storage facilities.	M	(i) Comprehensive cold storage assessment was conducted and needs identified. (ii) Additional cold storage equipment is being purchased under the World Bank Project as well as by GAVI. (iii) World Bank is also providing solarization for the medical facilities and hospitals to ensure improved power supply.	MOPH and development partners
Cold chain integrity - prolonged incursions outside of temperature regime will drastically reduce vaccine efficacy.	M	(iv) Insist on less temperature sensitive vaccine candidates (e.g 2-8 Celsius) that meet APVAX criteria. (v) Use of UNICEF and their institutional expertise in cold chain management.	MOPH and UNICEF
II. Financial and Financial Management Systems			
Implementing entity has little ADB experience in financial management and no experience of audit requirements and previous unresolved audit observations from other projects.	H	(i) Training of MOPH PIU staff on ADB financial management and disbursement guidelines and policies, including integrity risks and controls (ii) Financial management consultants will be engaged to support the MOPH (iii) An independent auditor will conduct a project financial reporting and performance audit using ADB-reviewed terms of references; the scope will include integrity risks and controls.	MOPH; and ADB
Ineffective procurement system and processes	M	UNICEF will be engaged on a Direct Contracting basis as a turnkey procurement agent to handle all aspects of goods and logistics procurement required under this grant.	MOPH, UNICEF and ADB
Inaccurate and incomplete financial information due to spreadsheet monitoring for some projects which uses MS Excel while some other projects use QuickBooks as their accounting software. ADB's emergency assistance grant uses the same tools which are MS Excel, QuickBooks and AFMIS	M	Implement accounting software for the project to reduce errors.	MOPH
Lack of standard financial data causes delay in producing data at the project and entity levels.	S	In collaboration with the World Bank, a new information system will be considered for the MOPH to ensure timely financial information.	MOPH, World Bank and ADB
Issues may not surface, as the	S	An internal audit unit will be required to audit the use of ADB funds; the detailed scope will be	MOPH

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internal audit does not audit the finance functions and PIU.		agreed with the MOPH to consider various aspects.	
Audit observations not resolved will continue exposing the PIU to significant risks in term of weak asset management and financial records.	M	(i) A detailed financial management action plan will be developed and regularly monitored to resolve the audit observations. (ii) An auditor's management letter will be required to enable PIU financial management specialist to follow up and resolve all audit observations. The resolution of audit observations will be monitored using the annual audited project financial statements along with reconciliation of project records with ADB disbursement records.	MOPH
III. Governance			
Weak internal framework and controls with unreliable systems result in risk of vaccines not being used for targeted groups.	H	(i) ADB will recruit a performance auditor to assess the implementation of the vaccine program and support the MOPH through engagement of consultants under ADB technical assistance (ii) The MOF will support capacity building of internal audit units	MOPH and ADB
Weak internal control framework with focus on financial compliance instead of systemic issues and internal controls.	M	The MOF Internal Audit Department supports capacity building of internal audit units in line ministries including drafting of an audit charter, manuals, and guidelines.	MOF
Risk of misappropriation of funds and difficulty in reconciliation of records due to MOPH's inability to monitor NGOs' work in some places due to security reasons.	S	(i) Strong emphasis on performance monitoring by the MOPH to ensure that only NGOs of good reputation implement the project, including monitoring by a third-party monitoring firm (ii) All financial records of ADB-funded projects will be maintained centrally at the PIU and new financial management staff will be recruited	MOPH
Widespread corruption and poor governance.	H	(i) Implementation will be aligned with the MOPH's anticorruption strategy through the High Office of Oversight and Anti-Corruption; the strategy will be implemented to minimize the risk of corruption (ii) Strong oversight and donor coordination mechanisms should contribute to preventing and mitigating the corruption risk (iii) The project financial management system has been designed to encourage accountability and minimize risks of corruption, and will include a review of primary payment documentation before endorsing for payment (iv) ADB will conduct integrity knowledge management session(s) for the MOPH and other project stakeholders to increase	MOPH, National Response Coordination Committee under the President, High Office for Oversight and Anti-Corruption, Anticorruption Commission, and development partners

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		<p>awareness of and compliance with ADB's Anticorruption Policy (1998, as amended to date)</p> <p>(v) The Anti-Corruption Commission, the National High Council for Rule of Law and Anti-Corruption, and the Anti-Corruption Justice Center will support and be engaged in preventing the risk of widespread corruption.</p>	
Current staff may be overburdened due to additional project related to vaccine.	M	ADB to provide additional consultant support to address capacity gaps.	MOPH
Inadequate benefits of staff cause staff turnover and lack of staff efficiency.	M	After the implementation of national technical assistance (NTA) salary scheme in 2016, the government started the implementation of another reform for employees benefits under the name of Rutub wa Maashat. However, this reform started at director level only with the intention of being implemented also for the rest of the employees. The donor agencies will discuss the impact of such reforms with MOPH to prevent the negative impact in project implementation in the long term.	MOPH
Vaccines not meeting APVAX qualification criteria.	M	The vaccine market is constantly changing as new candidates move through different trial phases and gain approval by WHO, SRA, and other governing bodies. MOPH is not in a position to monitor this quickly evolving aspect of the project, and the recommendation is transfer this risk to a turnkey procurement agent (such as UNICEF) that fully understands these matters.	ADB and UNICEF
Gender disaggregated data not being collected for vaccination campaigns.	M	MOPH will be incorporating gender disaggregation in its data collection tool. ADB will be hiring gender specialists to ensure collection of gender data.	MOPH and ADB
Vaccine hesitancy due to cultural and social norms.	M	Vaccinators will be composed of 1 male and female vaccinators. Intensive communication campaigns will be carried out by MOPH on benefits of COVID-19 vaccination.	MOPH and development partners
IV. Safeguards			
Poor implementation of national health care waste management plan (especially in health care centers in remote areas) resulting in adverse environmental and health impacts.	M	<p>(i) Proper monitoring of the medical waste management plan will be carried out to ensure its proper implementation.</p> <p>(ii) Recruitment of a waste management firm to provide necessary technical assistance to MOPH.</p>	MOPH and ADB

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Limited capacity of current medical waste disposal system to cater for the additional medical waste generated from COVID-19 immunization process.	M	(i) As part of COVID-19 EAG for Afghanistan processed earlier by ADB, appropriate waste disposal options (except for onsite incineration) have been provided in the Environmental Assessment and Review Framework (EARF) in accordance with ADB's guidance note on managing infectious medical waste. (ii) Some of the these newly installed equipment's can cater for the medical waste generated from this activity. (iii) Recommended to carry out a detailed due diligence study during the implementation phase to check if the existing medical waste disposal system can cater for the additional medical waste or not. Suitable recommendations will also be provided as part of this report.	MOPH and ADB
Inadequate training of health care staff on medical waste management plan	M	Training program for relevant healthcare workers, staff on national waste management plan.	MOPH

Notes: H = high risk, L = low risk, M = moderate risk

ADB = Asian Development Bank, AFMIS = Afghanistan Financial Management Information System, APVAX = Asia Pacific Vaccine Access Facility, COVID-19 = coronavirus disease, DHIS2 = District Health Information Software, EAG = Emergency Assistance Grant, EPI = expanded programme on immunization, MS = Microsoft, MOF = Ministry of Finance, MOPH = Ministry of Public Health, NGO = nongovernment organization, O&M = operations and maintenance, PIU = project implementation unit, SCO = Sehatmandi Coordination Office, SRA = Stringent Regulatory Authority, UN = United Nations, UNICEF = United Nations Children's Fund, VSSM = vaccination stock supplies management tool established by WHO, WHO = World Health Organization.

Source: Asian Development Bank.