



Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 30-Sep-2020 | Report No: PIDISDSA29083



BASIC INFORMATION

A. Basic Project Data

Country Afghanistan	Project ID P173314	Project Name EQRA Additional Financing	Parent Project ID (if any) P159378
Parent Project Name EQRA	Region SOUTH ASIA	Estimated Appraisal Date 07-Sep-2020	Estimated Board Date 01-Mar-2021
Practice Area (Lead) Education	Financing Instrument Investment Project Financing	Borrower(s) Islamc Republic of Afghanistan	Implementing Agency Ministry of Education, Ministry of Rural Rehabilitation and Development

Proposed Development Objective(s) Parent

The Project Development Objectives (PDO) are "to increase equitable access to primary and secondary education, particularly for girls, in selected lagging provinces, and to improve learning conditions in Afghanistan".

Components

Equitable Access to Basic Education Improving Learning Conditions Strengthening Education Sector Planning Capacity and Transparency Technical Assistance

PROJECT FINANCING DATA (US\$, Millions)

SUMMARY

Total Project Cost	25.00
Total Financing	25.00
of which IBRD/IDA	0.00
Financing Gap	0.00

DETAILS

Non-World Bank Group Financing

Trust Funds	25.00
	23.00



Education for All - Fast Track Initiative	25.00	
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Environmental Assessment Category

B-Partial Assessment

Decision

The review did authorize the team to appraise and negotiate

Other Decision (as needed)

B. Introduction and Context

Country Context

- 1. Substantial improvements in development outcomes have been observed in Afghanistan since 2001, particularly in expanded access to water, sanitation and electricity, education, and health services. Macroeconomic management remains strong, government revenues have grown consistently since 2014, and the government has engaged in a range of business environment and public financial management reforms. Expanded access to health, education, and infrastructure has seen rapid improvements in outcomes, with Afghanistan catching up with other low-income countries against key development indicators. While progress has been uneven, increased access to services and infrastructure has driven significant development gains.
- 2. At the same time, Afghanistan continues to experience insecurity and political uncertainty. The results of September 2019 Presidential elections were announced only in February 2020. Civilian causalities exceeded 10,000 again in 2019. Displacement crisis persisted and the number of conflicts induced Internally Displaced People increased from 369,700 in 2018 to more than 400,000 in 2019. 505,000 refugees returned to Afghanistan, mainly from Iran, during 2019.
- 3. Negotiations between the US and the Taliban have concluded on February 29, 2020, but the process of a political settlement is only beginning. Meanwhile, current international support pledges are due to expire in 2020, creating uncertainty regarding the sustainability of security and development expenditures. This has fundamental implications for the economy, with growth and investment constrained by weak confidence.
- 4. Afghanistan's economy is estimated to have grown by 2.9 percent in 2019 due to easing of drought conditions and rapid agricultural growth. The trade deficit remains extremely large, over 30 percent of GDP, financed mostly by grant inflows. Fiscal performance continued to improve with domestic revenues reaching 14.1 percent of GDP. Political uncertainties, however, dampened private sector



confidence and non-agriculture growth. The basic needs poverty rate was 55 percent at the time of the last survey (2016/17) and is expected to have worsened since. Due to the impacts of COVID-19, the economy is expected to contract by at least 5.5 percent in 2020. Poverty is expected to remain high.

5. Short-term priorities include continued implementation of reforms to improve private sector confidence, mobilize investment, and ensure confidence of the international community. Over the medium-term, reforms should focus on attracting additional investment in agriculture and extractives, to deliver increased employment, exports, government revenues, and growth. To ensure that benefits of growth are maximized, and widely shared, continued investment is required in human capital, regional connectivity, expanded infrastructure, and an improved business regulatory environment.

Sectoral and Institutional Context

- 6. The COVID-19 impacted significantly on the education service delivery in Afghanistan. As of September 30, 2020, there are 39,254 confirmed COVID-19 cases in Afghanistan; however, the actual number of cases is expected to be much greater, due to limited number of tests conducted in the country, and in the context of approximately 250,000 Afghans returning from neighboring Iran and Pakistan since January 2020, where a high number of COVID-19 cases are reported. In order to slow the spread of the disease in Afghanistan all education institutions have been closed since March 2020 and will continue to remain closed, except Grade 11 and 12, until March 2021 or possibly later. The Ministry of Education has developed a two-phased response plan. In phase one, the MoE focuses on an emergency response to continue service delivery, where possible, through TV, radio, self-directed learning and limited face-to-face instruction in small group while maintaining social distancing, and phase two, a recovery plan that focuses on re-opening of schools. Currently distance education through TV and Radio for Grade 1 to 12 and a pilot on face-to-face instruction in small groups while maintaining social distancing is ongoing.
- 7. Over the past decade, Afghanistan has made great strides in access to general education, but a large number of out-of-school children remains a grave concern. In 2018, more than 9 million youth and children were enrolled in general education schools, representing over nine-fold growth since 2001. The bulk of these students (around 6.3 million) were at the primary level, 1.9 million at the lower secondary, and another 1 million at the higher secondary level. While constructing new schools and adding infrastructure to existing schools has contributed increase in enrollment particularly for girls, half of the student population in Afghanistan are still being taught under tents or in open air. These conditions severely hamper student learning when inclement weather prevent students from attending schools. In addition to constructing new schools the government is looking to Community-Based Education (CBE) as a cost-effective way to provide access to education for children in remote areas, particularly girls. While CBE is a promising modality, it is implemented by various actors thus presenting coordination challenges for the government.
- 8. In 2018, the system has approximately 189,000 teachers. First, half of general education teachers do not meet minimum qualification requirements of a two-year post-secondary degree while 48% of the qualified teachers are teaching subjects other than what they studied. Second, the distribution of teachers is uneven across regions and is not correlated with the number of students or school-age



population. The instructional materials are not always level-appropriate and do not have sufficient focus on foundational subjects such as reading and writing.

9. There is consistent reliance on externally funded technical assistance (TA) causing concern for sustainability and capacity of permanent civil servants and regular structures. Additionally, corruption has worsened the condition of the education sector. Afghanistan has been consistently ranked in the bottom ten countries on the global corruption perception index. The government faces critical governance challenges ranging from teacher management to corrupt practices in teacher recruitment and systematic failures to prioritize girls' education. Similarly, lack of a rigorous and transparent system for allocation and delivery of resources such as provincial budgets, teaching positions, and educational materials to schools negatively affect the outcomes of investments in the sector. The country's deteriorating security situation affects supply and demand of the education services. Lack of the Government's regular presence in large parts of the country makes equitable delivery of education a challenge and constrains the MoE's ability to monitor and evaluate progress and program outcomes.

C. Proposed Development Objective(s)

Original PDO

10. The Project Development Objectives (PDO) are "to increase equitable access to primary and secondary education, particularly for girls, in selected lagging provinces, and to improve learning conditions in Afghanistan".

Key Results

- 11. The proposed AF will build on the strong design of the original parent program and finance the scalingup of selected themes currently included in EQRA, with the extensions of EGR teacher training and implementation support to the Gender Based Violence (GVB) action plan - both of which can be accommodated in the context of the existing project design. Since additional resources are being invested under the existing themes, project targets will be scaled up to reflect increased resources. The proposed AF remains fully aligned with the Third National Education Sector Plan (NESP III) 2017-2021. To-date, the MOE's and MRRD 's capacity and implementation arrangements have proven to be effective.
- 12. The original EQRA project development objectives (PDO) will remain unchanged which is "to increase equitable access to primary and secondary education, particularly for girls, in selected lagging provinces, and to improve learning conditions in Afghanistan." The AF will specifically expand activities under all four components of the EQRA project, with two extensions: subject teacher training for EGR program under component 2 and support to GVB action plan implementation under Component 3.
- 13. Specifically, the proposed AF activities will include: (a) Sub-component 1.1 expand equitable access through school construction and Sub-component 1.3 expand CBEs; (b) Sub-Component 2.1 improve learning conditions by providing teacher training for grades 1 to 3 teachers in EGR program, as well as carrying out an impact evaluation for subject knowledge training of teachers; Component 3 support



implementation of an action plan to improve capacity responding to GVB incidents; and (c) Component 4 - increase the technical assistance support to MOE and MRRD to improve their implementation capacity in the areas of project management, monitoring and evaluation.

D. Project Description

14. The proposed AF will be used to expand several successful EQRA interventions including:

Sub-component 1.1 - US\$10.0 million: increase school construction (incorporate it into the third tranche of the disbursement arrangement); Sub-component 1.3 - US\$5.0 million: expand access through CBE; Sub-component 2.1 - US\$5.5 million: provide teacher training for EGR; and US\$1 million: an impact evaluation of subject specific teacher training; Component 3- US\$1 million: support implementation of GBV action plans; and Component 4 – US\$2.5 million: increase the technical assistance support to improve implementation capacity, program management and M&E.

- 15. **Component 1 focuses on increasing equitable access to basic education (US\$15 million).** AF will support two activities under this component to ease constraints that limit school participation, especially for girls in selected lagging provinces. These will include: (i) Sub-component 1.1 Improving School Infrastructure the construction of additional 100 school buildings and provision of missing essential elements (such as missing classrooms, boundary walls, water points, and latrines of a school building) to 30 existing schools for the total amount of \$10 million; (ii) Sub-component 1.3 Supporting Community-Based Education expansion of CBE program. Some of the main activities under this include hiring and paying teachers to teach the CBE classes, and teaching and learning materials to CBE students and teachers and monitoring and evaluation of CBEs. To ease access problem of CBE students unable to transition to regular schools due to distance, new schools under AF will be constructed in areas which have CBEs but no existing regular schools.
- 16. For Sub-component 1.3 the capped amount of US\$10 million under EQRA is revised to US\$15 million and will be allocated in early 2021. This will be under the responsibility of the MoE, subject to the meeting the following conditions prior to the allocation to ensure successful implementation of CBE policy in guiding future expansion and ensuring quality and cost standards. Specifically, this includes developing guidelines on a harmonized approach to content, institutional setup, teacher salaries, operating costs and data to be collected and reported. The verification protocols will be described in the project's procedure manual. Under EQRA, the CBE operating manual is scheduled to be completed by early 2021. With the support of the AF, the CBE expansion will increase total number of beneficiaries from 33,000 to 49,500 students.
- 17. **Component 2 is aimed at improving learning conditions for students (US\$6.5 million).** The activity supported by the AF under Sub-component 2.1 Supporting Subject Training of Teachers of Selected Grades will improve standardization of teacher capabilities and quality assurance in support of the National EGR policy and the on-going USAID's EGR program in four provinces 1. The AF intervention will

¹ The USAID funded and MoE implemented EGR program started in 2016 in the four provinces of Herat, Nangarhar, Kabul and Laghman. The project is called the Afghan Children Read Project and of the total number of 70,000



continue to expand the 5-day in-service training in remaining 30 provinces for 30,000 teachers (of the total of 70,000) grades 1-3 teachers on EGR curriculum, including the phonic-based reading pedagogical approach in two official languages of instruction i.e. Dari and Pashto. Teachers will be selected following the methods and criteria identified in the Project Operations Manual (The priority be given to participation of female teachers). The in-service training will also include social and emotional learning (SEL) component which is context appropriate for Afghanistan.² EGR training will be in line with EGR performance standards to develop capacity of teachers to teach reading and evaluate students' learning progress and the use of radio as to support learning. In addition to the 5-day, school training, principals/headmasters will also receive additional two days training as mentors and coaches to provide on the job and permanent support to teachers.³ The in-service 5-day training will be organized at the central level by Teacher Education Department (TED) through a cluster-based and limited cascade model through Master trainers, TTC lecturers and the training class will average around 25-30 trainees, with two trainers as currently being implemented for the subject knowledge training of teachers under EQRA. Pre-tests, post-tests, and classroom observation will be carried out to ensure the effectiveness of the in-service EGR training and to provide feedback to teachers. The training activities will be completed in 2023.

- 18. To supplement the above training, continuous EGR support will be provided through professional learning communities, with once a month school-level visits in the form of continuous coaching and mentoring system to be carried out by supervisors and head teachers to promote and sustain strategies towards better teaching and learning performance in early grades. EGR teachers will complete competency testing to ensure adequate reading skills that meet teaching standards.
- 19. In addition, lack of qualified teachers is one of the major hindrances in providing quality education to children, with 48% of teachers (out of around 110,000) teaching subjects they are not qualified to teach. To address this issue, EQRA is supporting a one-year subject knowledge diploma for subject training to existing teachers. To complement this EQRA activity, the AF will fund an impact evaluation for 3,000 teachers trained under EQRA to provide future policy guidance on whether to proceed with the expansion of this training.

teachers who teach grades 1-3, 20,000 have already been trained. The training program benefits both public and CBE students in grades 1 to 3. The project has four main activities: (i) community engagement (ii) policy, planning, research, and assessment (iii) material development and distribution and (iv) teacher professional development. The program shows promise according to the midline evaluation conducted in 2019, especially for children in urban settings.

²The training consists of the following modules: Introduction to Early Grade Reading principals, introduction and use of Early Grade materials and symbols used in EGR books, teaching the activities of lesson 1-3, formative assessment, model lesson, healing classroom and social emotional learning, teaching specific activities for grade 3, using of supplementary materials, introduction to coaching and teaching large classes.

³ The EGR coaching follows two approaches: individual coaching and group coaching. Individual coaching is one to one approach in which coach helps teacher individually. The approach started with 1) pre-observation meeting with teachers 2) classroom observation 3) data analysis 4) post observation meeting and feedback. Group coaching takes place through Teacher Learning Circle (TLC) where group of EGR teachers meets once in month and discuss classroom level issues. Both individual and group coaching take place once in a month. The coaches are collecting data using classroom observation rubric.



- 20. This Sub-component will link to the new PBC 8 and 9, which will track the number of EGR teachers trained as well as completion of data collection of impact evaluation for the subject knowledge training of teachers under EQRA. The associated EEPs will be codes 22 and 25 from the discretionary and recurrent budget. The cost associated to AF comprise consultancies, training, materials, and supervision.
- 21. Component 3 focuses on strengthening education sector planning capacity and transparency (US\$1.0 million). The AF will support the implementation of GBV action plans under sub-component 3.2. The activities will include (i) establishment of the reporting system for GBV cases, and (ii) development of protocol on how to respond GBV cases once reported, in line with the GBV Action Plan. Specifically, reporting system would be established through consultation with students, teachers, and parents in schools to identify preference for safe, and child-friendly channels. In addition, the MoE team will develop the protocols through the documentation review on existing guidelines related to protocols for responding to incidents as well as the consultations with stakeholders including students, teachers, school principals, and local communities. PBCs will be added to reflect GVB inclusion. The implementation of this activity will be carried out by MoE, with supports of TAs funded under Component 4.
- 22. This GBV activity under Component 3 will link to the new PBC 10, which will track the implementation of specific programs of GBV Action Plan. The associated EEPs will be codes 22 and 25 from the discretionary and recurrent budget. The cost associated to AF comprise consultancies, training, materials, and supervision.
- 23. **Component 4 Technical Assistance (US\$2.5 million).** Given that the implementation of EQRA and the proposed AF is embedded in the line departments of the MOE (with no specific project PMU). To support the low project implementation capacity, this AF will ensure that necessary coordination between MOE and DPs and internally within the MOE are in place to ensure successful project implementation and monitoring. This component will include activities designed to strengthen project management and early identification of corrective measures to solve any implementation problems, especially those delays linking to COVID-19 and other systematic requirements. It will support institutional capacity development activities such as capacity building for civil servants arranged in line with their human resource mapping and development plan. The AF will support additional technical assistance (both local and international) to improve implementation capacity, project management, related training, operational costs, and M&E. To ensure effective use of resources, the budget for this component under the AF has taken into account investments already made under the EQRA project in staff development.

E. Implementation

Institutional and Implementation Arrangements



24. EQRA implementation arrangement will also remain in the implementation of the AF. This AF builds on the experiences of EQRA and is designed to avoid duplication and ensure complementarity with other development partner supported activities. Its preparation has been done in close consultation and coordination with development partners, taking into consideration their strategies, financing modalities and project development timeline. As a result, the AF will complement support from other partners to the education sector through both financial and technical support, under the NESP III and subsequent NESP (2022-2026), focusing on the central priorities of: a) quality and relevance, b) equitable access and c) efficient and transparent management.

F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

The specific location of proposed 100 new school construction sites are not known at this stage, while the construction sites will be spread across 17 lagging provinces of Afghanistan. Under component 1 of AF, the project will be financing construction of 100 new school buildings and refurbishment of 30 existing schools. Construction work will cover new school buildings with latrines, water well and boundary wall and enhancement of existing school environments by adding boundary walls, water wells and latrines. As the specific locations are not known at this stage, therefore the AF activities will adhere to the provisions set forth in the approved ESMF and RPF of the parent project. The proposed project is categorized as an EA Category-B, since the proposed project activities will not cause any significant or irreversible environmental and social impacts in the project areas.

G. Environmental and Social Safeguards Specialists on the Team

Sayed Mujtaba Shobair, Environmental Specialist Tariq Ashraf, Social Specialist

SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	
Performance Standards for Private Sector Activities OP/BP 4.03	No	
Natural Habitats OP/BP 4.04	No	



Forests OP/BP 4.36	No
Pest Management OP 4.09	No
Physical Cultural Resources OP/BP 4.11	No
Indigenous Peoples OP/BP 4.10	No
Involuntary Resettlement OP/BP 4.12	Yes
Safety of Dams OP/BP 4.37	No
Projects on International Waterways OP/BP 7.50	Νο
Projects in Disputed Areas OP/BP 7.60	No

KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The activities under the Additional Financing will involve construction of 100 new school buildings and rehabilitation of 30 existing schools, in addition to the total number of school construction work being completed under the parent project. These interventions are of small to medium-sized scale and thus, no potential large scale, significant and/or irreversible impacts are expected.

As of May 2020, construction of 443 schools (305 new school buildings and 138 schools with missing items) has been completed under the parent project. Since the start of parent project implementation, monitoring reports shared by MRRD, MoE and the third-party monitoring agency indicate that several sites have been selected in areas that are prone to natural hazards i.e. landslides, flash floods etc. In addition, the OHS aspects are not fully taken into consideration in the project sites. Another critical issue highlighted in the monitoring reports is the lack of land clearance and land ownership documentation. Furthermore, MoE is yet to transfer the ownership of the private land donation to the Ministry of Education. The reports also indicate that the GRM system is not fully functional across the project and GRC are yet to be established in several project locations.

As a result, the environmental and social safeguards performance rating of the parent project was downgraded to Moderately UnSatisfactory. To improve the safeguards performance rating of the parent project, an action plan has been developed which clearly outlines the actions to be taken by the client with specified timelines, to rectify the existing issues and avoid the occurrence of the same in the future. The action plan is intended to improve the safeguards' compliance and overall management under the project and therefor it will not result in need for revision of the project's E/S instrument. The above stated issues are mainly due to poor implementation of E/S provisions which was mainly as a result of delayed recruitment of E/S specialist for the project when there was no direct oversight (Project implementation started in March 2019 – E/S specialist was recruited in November 2019). Limited attention was paid by the E/S specialist from another Bank funded project by client under the same Ministry. The client will be required to fully implement the action plan prior to the effectiveness, which is scheduled in March 2021. The action plan outlines all the necessary actions to be taken to rectify the above-mentioned incompliances with



specific timeline. Based on the action plan MRRD will be required to design and implement additional mitigation measures for all the project sites which are prone to natural hazards. In addition, the action plan also requires to establish GRCs in areas where GRCs are not yet established. There would be capacity development interventions as well under the AF to ensure improve compliance with the provisions of the ESMF. The capacity enhancement/development intervention are proposed under component 3 of the AF.

The existing ESMF and RPF for the parent project, includes provisions and guidelines for avoiding and mitigating the environmental and social impacts envisaged both under the parent project and additional finance activities. Anticipated potential adverse environmental impacts are primarily during the construction phase of civil works (e.g. construction stage, debris generation, dust emission, noise, safety, and other standard impacts of construction). In addition, the site selection for the school is deemed to be a major risk, if the sites are not screened in accordance to the site selection criteria, provided in the ESMF. The environmental and social framework includes checklists and provisions to avoid selecting sites which are prone to natural hazards i.e. landslides, floods etc. The client is required to screen each site for potential environmental and social risks as per the screening checklists provided in the ESMF for parent project. For sites where no alternate locations would be available, adequate mitigation measures must be proposed and designed and integrated with the engineering design of each sub-project with approved budget.

Social safeguards impacts are mainly caused by temporary and/or permanent loss of land and other assets, particularly for new school buildings. Selection of sites for these activities must be screened for land disputes to avoid the situation where investments would fuel such disputes. The school construction has not resulted in resettlement so far, and there for no RAP has been prepared till date. This is mainly because the majority of the project sites identified by MoE are land parcels which are owned by the Ministry of Education. Alternatively, as reported by MRRD, other types of land provided for construction of school is either land purchased by community, community land or private land donations and none of these have resulted in resettlement so far. However, based on the need for the planned activities, RAPs would be prepared and implemented accordingly. However, the land clearance documentation and transfer of land ownership of the land purchased by community, community land or private land donations to the ownership of MoE has been a major challenge under the parent project, mainly due to existing lengthy processes of land clearance and lack of land records within the government institutions and archives. To resolve this issue, MoE has developed an abbreviated land clearance procedure which has been translated in to a land clearance form and approval has been obtained from Ministry of Urban Development and Land. MoE will complete the transfer of land ownership process for all privatly donated sites by end of December 2020.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area: No adverse potential indirect and/or long-term impacts due to anticipated future activities in the Project area have been identified.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts. It was determined that the environmental and social screening process as outlined in the Environmental and Social Management Framework (ESMF) will adequately address any potential negative impacts of future rehabilitation activities, and therefore, project alternatives did not have to be considered.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

Although both MRRD and MoE have operational experience of World Bank safeguard policies and have been



implementing the activities under EQRA project, yet the safeguards implementation under parent project has not been satisfactory. The improve the safeguards implementation at the field level, there is need for additional capacity development within the EQRA project team to ensure all the provisions of the ESMF and RPF are fully implemented and complied with at all stages of the project implementation. The parent project has hired E/S specialist who will be retained throughout the project implementation and will provide support for the implementation of AF activities as well. MRRD and MoE have already hired dedicated Environmental and Social Safeguard specialist at the central level and environmental and social safeguard officer (ESS) at the provincial level to ensure the implementation of the relevant safeguard tools, which will be developed for each specific site. The capacity development intervention will be supported through Component 3 of the AF to improve the safeguards management and its institutional arrangements under both the parent project and the AF.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

There have been no consultations on the ESMF for the AF, as the AF activities will be subject to the requirements of the existing EMSF of the parent project, and there is no need for any revision, as this AF is focused on expanding existing activities under the parent project. There had been consultations conducted for the ESMF prepared for parent project, the details of which are included in the existing ESMF. There will be no change in the project stakeholders due to the fact that the AF activities will remain the same as the parrent project. The key stakeholders are the Governmental institutions i.e. Ministry of Finance, Ministry of Education, Ministry of Rural Rehabilitation and Development and any other relevant governmental/non-governmental organizations including relevant UN agencies and other relevant international donors agencies. The stakeholders also include project beneficiaries and those who may be affected by the project activities and civil society.

The activities under the parent project are mainly implemented through community development councils. The members of these councils are the representative of the concerned communities who consult with the project beneficiaries and there is a process of community consultations at sub-project level prior to initiation of project activities. The CDCs have been advised to ensure adequate social distancing and use masks during any kind of gatherings including project consultations. However, as of today, the government has not imposed any lockdown or quarantine at the district level (lockdowns were only imposed in major cities across the country), therefor there hasn't been any restriction on gatherings at the field level, where the consultations are conducted.

In addition to the consultations on the project related activities, CDC members have also been raising awareness on COVID related risks to the communities. The ESMF and RFP prepared for EQRA project have been disclosed on MRRD's and MoE's websites as well as the World Bank' external website

B. Disclosure Requirements (N.B. The sections below appear only if corresponding safeguard policy is triggered)

Environmental Assessment/Audit/Management Plan/Other

Date of receipt by the BankDate of submission for disclosureFor category A projects, date of
distributing the Executive Summary of
the EA to the Executive Directors



"In country" Disclosure

Resettlement Action Plan/Framework/Policy Process

Date of receipt by the Bank

Date of submission for disclosure

"In country" Disclosure

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting) (N.B. The sections below appear only if corresponding safeguard policy is triggered)

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APPROVAL

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Country Director:	Homa-Zahra Fotouhi	12-Oct-2020

