Report Number: ICRR14840

IEG ICR Review
Independent Evaluation Group

1. Project Data:		Date Posted:	10/09/2015	
Country:	Madagascar			
Project ID:	P103950		Appraisal	Actual
Project Name:	Governance And Institutional Development Project Ii	Project Costs (US$M):	40.0	25.2
L/C Number:		Loan/Credit (US$M):	40.0	25.2
Sector Board:	Public Sector Governance	Cofinancing (US$M):		
Cofinanciers:		Board Approval Date:		06/03/2008
		Closing Date:	08/31/2012	08/31/2014
Sector(s):	Central government administration (82%); General public administration sector (10%); Law and justice (5%); Sub-national government administration (3%)			
Theme(s):	Administrative and civil service reform (25%); Public expenditure; financial management and procurement (25%); Other accountability/anti-corruption (24%); Other public sector governance (13%); Managing for development results (13%)			

Prepared by:	Reviewed by:	ICR Review Coordinator:	Group:
Katharina Ferl	Clay Wescott	Lourdes N. Pagaran	IEGPS2

2. Project Objectives and Components:

a. Objectives:

The Project Appraisal Document (PAD, p. 8) states that the Project Development Objective (PDO) was “to improve the efficiency and transparency of government and selected public services in Madagascar in line with the Madagascar Action Plan (MAP)”. The Financing Agreement (p. 5) of July 15, 2005 states the same PDO.

The PDO was revised and the amended Financing Agreement (p. 5) of October 11, 2012 states that the revised PDO was “to strengthen the Recipient's public financial management and social accountability at the central government and at the Communal levels.”

This Review will undertake a split rating, consistent with the harmonized guidelines because the original PDO was changed in the 2012 restructuring .

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

Yes

If yes, did the Board approve the revised objectives/key associated outcome targets?

Yes

Date of Board Approval: 10/11/2012

c. Components:

Originally the project consisted of six components:

Component 1: Improvement of Public Expenditure Management (appraisal estimate US$14 million, or US$ 12.58 million after exchange rate depreciation , actual US$5.18 million): This component was to finance the support for the reform of the public expenditure management system in Madagascar by improving the budget preparation and execution processes, rationalizing the public investment process, and supporting procurement and revenue agencies reforms.

Component 2: Strengthening the Efficiency of Government Operations (appraisal estimate US$8 million, or US$ 7.34 million after exchange rate depreciation , actual US$4.35 million): This component was to finance support to the change management and institutional development processes in regard to the implementation of the MAP, especially in the President's office, Prime Minister's office, and priority ministries such as education, health, transport and public works. This component included activities such as capacity building in senior government officials to implement different reforms, and upgrading of local training institutions.

Component 3: Rule of Law and Fight Against Corruption (appraisal estimate US$2.50 million or US$0.86 million, after cancellation and exchange rate depreciation , actual US$0.65 million): This component was to finance assistance to the Government in promoting transparency, accountability and good governance to reduce corruption. Activities included improving the operational efficiency of the judiciary, strengthening the oversight by the Auditor General and by Parliament over State affairs, liberalizing public disclosure regulations, and establishing an Economic Crimes Unit.

Component 4: Transparency and Social Accountability (appraisal estimate US$4 million or US$3.67 million after exchange rate depreciation , actual US$0.7 million): This component was to finance the support for increased implication of civil society in State affairs and to improve social accountability. Activities included the setting up of a mechanism for social accountability grants for monitoring natural resource management, local service delivery, and public financial management by civil society.

Component 5: Monitoring & Evaluation (appraisal estimate US$7 million, or US$0.01 million after cancellation and exchange rate depreciation US$0.58 million, actual US$0.01 million): This component was to finance technical assistance to the Government's monitoring and evaluation system. Activities included institutional restructuring and capacity building within the National Statistics Office, modernizing the procedural and institutional framework for Monitoring & Evaluation, and supporting a partial census.

Component 6: Program Coordination (appraisal estimate US$2.50 million, or US$1.84 million after exchange rate depreciation, actual US$1.33 million): This component was to finance technical assistance for the management and implementation of this project, in particular, assisting the Ministry of Finance to effectively manage donor and government funds designated to financing public expenditure management reforms.

During the project restructuring on August 31, 2012 some of the original components were revised (components 1 and 2) and two new components were introduced :

Component 1 – Revised: Improvement of Public Financial Management (estimate at restructuring US$13.33 million, actual US$10.1 million): Several activities of the original component were kept but activities were refocused to ensure the implementation of priority public finance management reforms. Also, additional activities to enhance budget transparency, support citizen's access to budget data, and a new auto-evaluation methodology of the Public Expenditure and Financial Accountability was introduced.

Component 2 – Revised: Improvement of Local Governance (estimate at restructuring US$8.38 million, actual US$8.35 million): Due to the unconstitutional change in Government in March 2009, activities which were directly implemented by the Presidency aiming at strengthening the efficiency of Government operations were cancelled. Instead, the component focused on supporting selected cross-cutting reforms, such as decentralization and land management reforms with a view of improving, through integrated approach, communal taxation, land tenure rights, local Government management and social accountability.

Component 3 - New: Institutional Strengthening & Knowledge Management (estimate at restructuring US$4.9 million, actual US$3.7 million): This component was to finance the strengthening capacity of selected state and non-state actors to enhance social accountability, access to information and knowledge sharing, and supporting the Global Distance Learning Network to ensure its sustainability by project closing.

Component 4 – New: Project Coordination (estimate at restructuring US$2.3 million, actual US$3.1 million): This component was to finance the building of capacity within the Project Implementation Unit to improve the overall project implementation.

d. Comments on Project Cost, Financing, Borrower Contribution, and Dates:

Project Cost: The original project was estimated to cost US$40 million of which US$25.2 million was disbursed (63% of appraisal estimate).

Financing: The project was financed by a US$ 40 million IDA credit.

Borrower Contribution: The borrower was to contribute US$4 million, actual contribution was US$0.05 million.

Dates: The project was approved June 3, 2008, and became effective October 10, 2008. On August 15, 2012 the project was restructured as follows: i) the PDO was revised; ii) two of the original components were revised (Components 1 and 2), four of the six original components were dropped, and two components were added (Components 3 and 4); the Results Framework was adapted to take into account the change in the PDO, project components and activities; iii) implementation arrangements were revised; and iv) proceeds were reallocated to reflect the changes in project activities; v) the Project Implementation Unit was moved from the President's Office to the Prime Minister's Office. The project closed August 31, 2014. This was two years after the originally scheduled closing date, as provided for in the restructuring to allow time for the new measures to be carried out.

3. Relevance of Objectives & Design:

a. Relevance of Objectives:

Original Objective: Substantial
Revised Objective: Substantial

The original and revised objectives were highly relevant given the governance challenges Madagascar was facing during the early years of 2000. These challenges included weak governance and public expenditure management, low level of revenues, weak legal and judicial public administration, insufficient (decentralized) service delivery, low levels of social accountability, weak institutional capacity, and lack of coordination of reforms, monitoring and evaluation. In 2006, the government of Madagascar launched the Madagascar Action Plan (MAP) which aimed to reduce the poverty level in the country by 50% between 2007 and 2012 by promoting strong growth and high level of investments, and improving social indicators. The original and revised objectives were in line with the Bank's Country Assistance Strategy (2007-2011) at the time of appraisal which identified responsible governance and accountability as critical for a successful implementation of the MAP. The objectives were also in line with the latest Interim Strategy Note (FY12-FY13), which sees weak governance and low public sector capacity as the main challenges for the government to achieve positive development outcomes.

However, the project objectives were broad and ambitious given the country context.

b. Relevance of Design:

Original Design: Modest
Revised Design: Modest

The planned activities were relevant to the achievement of the project's objectives. Reforming the public expenditure management system, strengthening change management and institutional development processes, improving the operational efficiency of the judiciary and social accountability would all lead to an improvement in efficiency and transparency. While the causal relationships between some of these planned interventions and underlying assumptions about how these program actions would lead to intended outcomes were logical and properly laid out, the project design had several shortcomings. The project had a wide scope, was overly complex, and included too many beneficiaries and stakeholders. Also, the linkages between the different components was weak.

Activities to achieve the new PDO aimed to strengthen the government's accountability and improve its transparency to enable monitoring of public policies and service delivery. The casual chain between funding and outcomes was clear. However, after the restructuring, the project was still too ambitious, with too many diverse beneficiaries and stakeholders. It also did not sufficiently take the volatile political situation, resistance to reform, and previous delays in project implementation into account.

4. Achievement of Objectives (Efficacy):

Original PDO: To improve the efficiency and transparency of government and selected public services in Madagascar in line with the MAP : Negligible

The project achieved various outputs: the Government of Madagascar's Local development fund was decentralized and the participatory budgeting of 50 selected municipalities was rolled-out; and training of 206 community facilitators and the development of health community scorecards were financed. The four PDO indicators intended to measure achievement of the objective were not rated in the ICR. Looking at other data sources, one of them, increase in tax/GDP ratio (baseline 11.1% in 2008; target 13% in 2012), actually worsened to 9.2% in 2012 (2014 IMF Article IV consultation report: 27). Another one, increase in indicators under the Public Expenditure and Financial Accountability Assessment rated "B" and above decreased from a baseline of 9 in 2008, to 5 in 2014. There were two intermediate outcome indicators looking at sub-groups of ratings that were also not met. The 2010 population census was cancelled, progress reports were not submitted on a quarterly basis as planed but interim audited financial reports were issued quarterly. There was no data available to measure progress towards the achievement of the majority of intermediate outcome indicators, which were dropped during the August 2012 restructuring.

Revised PDO: To strengthen the Recipient's public financial management and social accountability at the central government and at the Communal levels :

To strengthen the Recipient's public financial management at the central government : Modest

The project achieved various outputs under this objective: Forty ministries published budget quarter execution reports through the media or the internet, exceeding the target of 10 ministries. According to the ICR (p.xi) technical issues on the website limited the publication of reports on the Internet. The average of the Local Governance Index, (an index which was developed by the Local Development Fund to measure communal Government on the basis of their achievements in adapting principles of good governance such as efficiency, citizen participation, equity, transparency, accountability, and rule of law) increased from 3.9/10 in 2012 to 5.13/10 in 2014, surpassing the target of 4.5/10.

A Public Expenditure Financial Accountability assessment was conducted and compared to results of the 2006 and 2008 assessments. The assessment included indicators linked to transparency. Only one indicator increased its rating (scope, nature, and follow-up of external audit), not achieving the target that three indicators would improve. Three of the indicators linked to transparency had their ratings decrease, and three stayed the same.

Finally under this PDO, 29.11% of the Global Development Learning Network is covered by its own resources, not achieving the target of 60%. The ICR (p.xviii) states that the financial sustainability of the network is likely better than the reported data since it has improved its revenue prospects through partnerships with national and international institutions.

To strengthen the Recipient's public financial management at the Communal levels : Modest

91% of Local Development Fund communities had an improved Municipal Financial Management Index score (D+) surpassing the target of 50%. 45% of Local Development Fund communities improved their Project Management and Implementation Indicator score (D+), not achieving the target of 65% or the baseline of 55%. 70% of municipalities published information on public service in compliance with BIANCO (the national corruption agency) recommendations, not achieving the target of 100%. Some of these achievements benefited from use of innovative coaching and Rapid Results Initiatives. 537,314 land parcels were recorded for local taxation, surpassing the target of 8,000 land parcels. However, the ICR (p.52) states that the identification of these land parcels took place at the end of the project. Therefore, it is difficult to determine the impact on the beneficiary municipalities in regards to revenue increases. 15,837 land parcels requests were processed. The ICR (p.xvii) states that no land certificates have been issued due to the government's decision to stop the issuing of land certificates prior to the approval of the Municipal Land Development Plan.

To strengthen the Recipient's social accountability at the central government and the Communal levels: Modest

72 civil society organizations received a grant, surpassing the target of 45. 239 public institutions endorsed publicly the "access to information and knowledge sharing charter". 136,000 visitors went on the website of the National Institute of Statistics. A knowledge management database was set-up and is accessible on the internet. 506 social accountability initiatives were implemented at the local level surpassing the target of 450 initiatives.

At the national level a pilot for an Open Budget Index, an independent, comparative measure of budget transparency, was completed. The evaluation resulted in only a 14 points score out of a maximum of 100 points.

5. Efficiency:

Negligible: The PAD includes a Cost-Benefit Analysis, which assumes that the costs of the project consist of the initial investment and increasing recurrent cost of the targeted departments and agencies benefiting from the project. The benefits of the project are defined as savings from a reduction in the misuse/misappropriation of public resources and a reduction in the cost carried by households and the private sector resulting from corruption. The analysis specified project activities that would result in the most important quantifiable benefits. These activities included: i) continuous development of integrated financial management; ii) coordination of public procurement reforms; iii) strengthening of internal and external control functions of the public finance system; and iv) improving the tax and custom administration.

The analysis assumed that the project will lead to an annual reduction in misuse/misappropriation of 10%. It was estimated, based on limited data from the *Brigade d'Inspection et de Verification du Tresor* and by the *Inspection Generale de l'Etat (IGE)* and other sources, that the average annual amount of misused public resources was US$39 million. Also, the analysis assumed that the reduction of the misuse/misappropriation of public resources and the projects contribution to the increase in revenues will peak as of year 5. The analysis estimates that over a ten year period the total benefits generated by these activities will reach a net present value of approximately US$446 million.

At restructuring, the Cost-Benefit Analysis was updated to reflect the country context at that time. The net present value was estimated at US$420 million over 10 years. The reduction in expected benefits was linked to the decline in fiscal revenues between 2009 and 2011. Additional benefits were expected to materialize through the roll-out-of the Integrated Financial Management System. It was estimated that the Ministry of Finance and Budget will save US$1.4 million in operating costs.

The Bank team stated that efficiency improved after the restructuring since only project activities, which would be sustainable, were selected. However, the project continued to experience delays in project implementation due to the challenging political situation.

The ICR did not provide an Economic Analysis due to the lack of data. It states that at restructuring, project management costs were 38% higher than estimated and represented 12.4% of total cost. High project management costs, delays in disbursement and implementation of activities and limited achievement of project development objectives were indicative of significant inefficiencies in the use of the project's resources. Together with lack of other evidence, this leads to an efficiency rating of Negligible.

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

	Rate Available?	Point Value	Coverage/Scope*
Appraisal	No		
ICR estimate	No		

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

6. Outcome:

The project's outcome is rated Unsatisfactory. This rating is based on a calculation according to the ICR gu idelines Appendix B. At the time of restructuring, US$ 12.4 million was disbursed, which was 49.2% of the total disbursed credit (US$25.2 million). After the restructuring, an additional US$12.8 million was disbursed, which was 50.8% of the total credit. The project outcome before restructuring was rated Highly Unsatisfactory based on high relevance of objective, modest relevance of design, negligible efficacy on the objective and negligible efficiency. The project outcome after the restructuring was Unsatisfactory based on high relevance of objective, modest relevance of design, modest achievement of all four objective. Efficiency was negligible. Applying the harmonized IEG/OPCS formula [(.49*1)+(.51*2)= 1.51] for this restructured project, achievement of project outcome is rated as Unsatisfactory.

a. Outcome Rating: Unsatisfactory

7. Rationale for Risk to Development Outcome Rating:

Madagascar has gone through a politically unstable period of time, which had a negative impact on the implementation of the MAP and the project's outcomes. The country still experiences political uncertainty and significant challenges in financial management and social accountability. The project had little ownership, and capacity building within the administration was limited. Even though governance is one of the focus areas of the government's National Development Program, which was adopted in 2015, the country still faces strong vested interests which will likely resist reforms. Therefore, the risk to development outcome rating is High.

a. Risk to Development Outcome Rating : High

8. Assessment of Bank Performance:

a. Quality at entry:

The project's design built on lessons learned from the first Governance and Institutional Development project. The Bank conducted in-depth analytical work including a political economy analysis and took initial lessons learned from the first Governance and Institutional Development Project into account which was still ongoing when this project was being prepared.

The Bank identified relevant risk factors during project preparation. Those risks included weak managerial, organizational, institutional, and technical capacity to implement complex reforms, low compliance with changes to institutional and procedural framework, and resistance to the implementation of the social accountability activities. However, mitigation efforts were not sufficient for addressing some of these risks, especially related to capacity and low compliance to reform, which led to delays in project implementation.

The Results Framework had several shortcomings and included several indicators that were tracking the same progress (see section 10a for more details). It was planned that the government's M&E system for the MAP would be used, however, when the project became effective, the system was not operational.

According to the ICR (p. 7) the Bank conducted a Quality Enhancement Review, which identified the following weaknesses; i) the project had a broad scope and was complex; ii) linkages between components, and the explanation why certain components were included in the project was weak; and iii) activities and risk management of the transparency and social accountability component were not specific enough.

Quality-at-Entry Rating: Moderately Unsatisfactory

b. Quality of supervision:

Due to the challenging political environment, the project implementation took six years, instead of four years, including a two year suspension period. The ICR states that the project was well supervised during the initial implementation phase. In March 2009, OP/BP 7.30 (dealing with *de facto* government) was applied, and the dialogue with the Government was restricted to technical discussions. According to the ICR (p. 9) due to the application of OP/BP 7.30 and some procurement issues the Bank intensified its supervision efforts. The ICR (p.10) states that this intense approach had a negative impact on the relationship with the government, and the implementation of project activities.

In August 2012, the Bank restructured the project to better take the country and sector context into account and to better adapt it with the Bank's Interim Strategy Note. However, the restructured project remained overly ambitious given the limited commitment by the government. Also, the Bank did not sufficiently engage with stakeholders to ensure project ownership, resulting in implementation delays, which had a negative impact on the achievement of the project's objectives and sustainability of implemented activities.

The Mid-Term Review was conducted six months before project closing.

Quality of Supervision Rating : Moderately Unsatisfactory

Overall Bank Performance Rating : Moderately Unsatisfactory

9. Assessment of Borrower Performance:

a. Government Performance:

The project was implemented during a politically challenging time. According to the ICR (p. 20) from project appraisal in June 2008 until March 2009 the government was very committed to the implementation of the project, which was seen as a critical element to the Government's MAP. However, in March 2009 an unconstitutional change in government resulted in a crisis and the government's commitment to the implementation was very limited. During the time between the restructuring in August 2012 and project closing in August 2014, government commitment was mixed. While local governments were interested in the decentralization reform process, the Ministry of Finance and Budget showed limited commitment. The ICR (p. 20) also states that the government was not proactive in addressing implementation delays or requesting an extension of the closing date.

Due to the instable government situation, the government did not clearly define the role of the Project Coordination Unit (PCU), which led to conflicts between the PCU and stakeholders and resulted in project implementation delays (see section 9b for more details). Also, given the M&E system's weaknesses, its result could not be used to inform the government in its decision making process (see section 10 for more details).

Government Performance Rating Moderately Unsatisfactory

b. Implementing Agency Performance:

Initially the PCU was anchored in the President's Office and benefited from strong leadership. During the restructuring the PCU was moved to the Prime Minister's Office, which was seen as a more neutral place for its location. However, at this location, the PCU experienced less leadership. According to the ICR (p. 20) PCU experienced several challenges during project implementation. After the political crisis in March 2009, the PCU's role was unclear. There were disagreements between the PCU and stakeholders about the PCU's role in the reform process led to delays in project implementation and the restructuring process. While financial management and procurement systems were in place, the PCU had to perform its task with few staff. Therefore, during the last year of implementation, the PCU experienced challenges in terms of a large amount of procurement requests. The ICR (p. 8) states that the implementation of many important activities was rushed after the restructuring, resulting in poor quality and lack of sustainability.

Implementing Agency Performance Rating : Moderately Unsatisfactory

Overall Borrower Performance Rating : Moderately Unsatisfactory

10. M&E Design, Implementation, & Utilization:

a. M&E Design:

The original Results Framework included four PDO indicators and 14 intermediate outcome indicators. During the project restructuring in August 2012, two of the original PDO indicators and 13 of the intermediate outcome indicators were dropped, two intermediate outcome indicators were revised. Also, three new PDO indicators and seven intermediate outcome indicators were added.

In the original Results Framework two intermediate outcome indicators, 3.8 and 4.12, did not have baseline data. The revised Results Framework had several shortcomings such as PDO indicator 2 measured the number of ministries publishing budget execution reports without requiring a certain standard of quality and therefore output rather than outcome oriented. Also, PDO indicator 3 measured several dimensions at once such as direct project beneficiaries, amount of people trained, women trained, municipality benefiting from municipal grants, and civil society organizations benefitting from social accountability. Also, the link between this PDO and the objectives is not clear. In addition, the target value of intermediate outcome indicator 2.2 was lower than its baseline value.

It was planned that the government's M&E system for the MAP would also be used for the monitoring of this project. Also, it was intended that the MAP's M&E system would be strengthened during project implementation. However, at project approval, MAP's M&E system was not operational and could not be used to track progress towards the project's objectives. The PAD had identified the challenge of M&E reform due to unclear division of responsibilities in that area between the Presidency, the Prime Minister's office, and the sector ministries.

b. M&E Implementation:

An M&E system for the project was finally developed at the time of restructuring. Data inputs were not provided in a timely manner by entities responsible for data collection, and there were issues with the quality of the data. A supervision mission in July 2014 found that the M&E performance of the project was unsatisfactory. The ICR does not comment to what extent any weaknesses were addressed during implementation.

c. M&E Utilization:

The ICR (p.10) states M&E result could not be used to inform decision making.

M&E Quality Rating: Negligible

11. Other Issues

a. Safeguards:

The project was classified as Category C and did not trigger any safeguard policies.

b. Fiduciary Compliance:

Financial Management

According to the ICR (p.10), the project had appropriate financial management arrangements in place throughout the implementation period. The quarterly financial reports and the annual audit reports with clean opinion were submitted on a timely manner and recommendations were taken into account for project implementation.

Procurement

According to the ICR (p.11) procurement was Moderately Satisfactory throughout the entire project period. During the last year of project implementation procurement experienced challenges due to a large amount of procurement requests. In 2012 and 2014 two procurement reviews were conducted, which identified the overall risk rating as “moderate” and did not find any major procurement weaknesses.

c. Unintended Impacts (positive or negative):

d. Other:

12. Ratings:	ICR	IEG Review	Reason for Disagreement/Comments
Outcome:	Moderately Unsatisfactory	Unsatisfactory	There were major shortcomings in the project's design, efficacy and efficiency.
Risk to Development Outcome:	High	High	
Bank Performance:	Moderately Unsatisfactory	Moderately Unsatisfactory	
Borrower Performance:	Moderately Unsatisfactory	Moderately Unsatisfactory	
Quality of ICR:		Satisfactory	

NOTES:
- When insufficient information is provided by the Bank for IEG to arrive at a clear rating, IEG will downgrade the relevant ratings as warranted beginning July 1, 2006.
- The "Reason for Disagreement/Comments" column could cross-reference other sections of the ICR Review, as appropriate.

13. Lessons:

This Review draws from lessons from the ICR, including:

- In politically unstable countries with a changing institutional environment, restructuring a project can be an opportunity to adapt the project to new circumstances. The project was not sufficiently adapted to the often changing political environment and was still too ambitious and complex. This had a negative impact on project implementation and project outcomes.
- Government commitment and leadership are important for achieving the project’s objectives. In this project, lack of political commitment, resistance to reform, and little engagement with a large number of stakeholders resulted in not achieving the project’s objectives.
- During a period of political crisis working with Civil Society Organizations and local governments can be beneficial to moving the reform process ahead. In Madagascar, while the national government was not focusing on public sector reforms during the political crisis, local governments and non-government entities were interested in reforms and taking actions that were in their area of responsibility.

A lesson added by IEG:

- When a project is not performing well and its progress towards the project’s objectives is rated Moderately Unsatisfactory and Unsatisfactory over a five year period (with the majority of the time being rated Unsatisfactory), the Bank should consider cancelling the project rather than financing activities that do not lead to the intended results.

14. Assessment Recommended? ○ Yes ● No

15. Comments on Quality of ICR:

The ICR provides a good overview of project preparation and implementation. It is appropriately candid and identifies extensive and useful recommendations. However, the ICR refers to certain things such as the Poverty Reduction Support Credit (p.6) but does not sufficiently explain how this is linked to the project. Also, the ICR mentions Public Expenditure Financial Accountability indicators (p. xi) but does not explain what they measure. The ICR reports outputs per component (p.27) but does not distinguish between before and after the restructuring. Therefore, it is difficult to determine which outputs can be attributed to which phase of the project. The ICR is not results driven. The outcome impact indicator for number of indicators under the Public Expenditure and Financial Accountability Assessment rated “B” and above is incorrectly scored at 13 for 2008, rather than the correct value of 9. The ICR is rated Satisfactory, but marginally so.

a.Quality of ICR Rating : Satisfactory