PROGRAM-FOR-RESULTS INFORMATION DOCUMENT (PID)
CONCEPT STAGE

Report No.:PIDC0141375
(The report # is automatically generated by IDU and should not be changed)

Program Name	Ghana Secondary Cities Support Program
Region	Africa
Country	Ghana
Sector	Urban
Financing Instrument	Program-for-Result
Program ID	P164451
Borrower(s)	Republic of Ghana
Implementing Agency	Ministry of Local Government and Rural Development
Date PID Prepared	November 17, 2017
Estimated Date of Appraisal Completion	May 2018
Estimated Date of Board Approval	September 2018
Concept Review Decision	Following the review of the concept, the decision was taken to proceed with the preparation of the operation.

I. Introduction and Context

A. Country Context

1. ***Ghana has experienced strong economic growth over the past decades***. Ghana's growth rate has been faster than other Sub Saharan Countries. Its annual Gross Domestic Product has increased 5.7 percent per annum over 1984-2013, with the economy growing at 7.8 percent per annum over 2005-2013. Since 2011, with the start of commercial oil production, the mining industry, construction, and the services sectors have expanded, whereas the manufacturing sector has stagnated. Ghana's growth model has become increasingly dependent on natural resources. To overcome poverty and increase shared prosperity, Ghana will need to create better job opportunities in non-agricultural/non-natural resource sectors and increase agricultural incomes.

2. ***Ghana has, by and large, been at the forefront of poverty reduction in Africa since the 1990s***. Significant poverty reduction and shared prosperity was realized over the last three decades. The country achieved the goal of reducing the poverty rate by half in line with the first Millennium Development Goal target, without increasing income inequality. Spatial inequality amongst the ten regions of Ghana, however, is of concern as the number of poor have increased in three out of the ten regions of the country[1].

3. ***Ghana's vision is one of transformation to an industrialized high income country by 2057***. This is enshrined in the Long-term National Development Plan of Ghana (2018-2057). Economic growth, social inclusion, resilient human settlements, and environmental sustainability

[1] Volta, Northern and Upper West regions.

are the main objectives of this Plan, and are to be achieved through greater administrative and fiscal decentralization. The newly elected Government aspires to enable a transformative shift in development focus *from* rural-based agricultural productivity *to* urban-based industrialization, promoting “One District, One Factory”.

B. Sectoral and Institutional Context of the Program

4. ***Complementing growth, urbanization has been an important factor in Ghana’s poverty reduction efforts.*** It took Ghana 15 years (1995-2010) to transition from 14 percent urbanization to 51 percent, more slowly at all levels of urbanization than the global average. Between 1984-2013, the urban population grew at 4.4 percent per year, and urbanization went up from 31 percent to 51 percent. Urban population more than tripled from under 4 million to 14 million people. Total poverty incidence dropped below 25 percent in 2013 and below 11 percent in urban areas.

5. ***While all regions of the country experienced steady urbanization, smaller cities are growing faster***. In 2000, there were a few limited metropolitan areas and many small towns. Since then, all city types have dramatically increased in number, and Ghana’s smaller cities have experienced faster urban population growth than its larger ones. The number of medium cities (20,000-50,000 people) and large medium cities (50,000-100,000 people) has quadrupled and tripled respectively. In 2000 there were only 9 towns with population between 50,000 and 100,000; by 2010 there were 36 such towns. Accra has grown considerably, but its primacy has diminished from 24.4 percent of the country’s population in 1984 to 16.6% in 2010. Kumasi is expected to be home to 4.2 million people by 2030, at which time, Accra is expected to have 3.26 million people.

6. ***Across all city sizes, however, the proportion of residents with access to basic services and infrastructure is declining, and the proportion is worse in smaller cities***. Unplanned low-density spatial expansion has negatively impacted intracity inequality in basic service provision. Networked infrastructure services have been unable to keep up with demand. Only 38.6 percent of households use pipe-borne water as a main source of drinking water. Between 2000 and 2010, there was an increase in the proportion of households without any toilet facility in all city size groups. The worse decline occurred in smaller urban centers. Solid waste disposal and sewerage remains a challenge across all urban areas, with most liquid waste simply disposed outside in smaller urban centers.

7. ***In recognition of the importance of urbanization in Ghana’s development, the Government promulgated the National Urban Policy in 2012***. The Policy highlights: (i) the rapid nature of the process of urbanization, and (ii) the limited preparedness of both local and central governments to meet or address the emerging challenges of the process in terms of adequate and stable staffing, financing, budget execution, enforcement of development control and accountability. It points out that failure to respond to these challenges in a timely manner have resulted into (a) weak urban economy, (b) land use disorder and uncontrolled urban sprawl; (c) increasing environmental deterioration; (d) inadequate urban infrastructure and services; (e) increasing urban insecurity; (f) urban poverty, slums and squatter settlements; (g) weak urban governance and institutional coordination; (h) inadequate urban investment and financing; (i)

weak urban transportation planning and traffic management, and (j) delimitation of urban areas of jurisdiction, and lack of integrated planning across jurisdictional boundaries.

8. ***Ghana's decentralization system provides support to local governments to meet urbanization challenges and fulfill their mandates***. Decentralization is enshrined in Ghana's Constitution[2]. The system and functions of local governments are regulated by the Local Governance Act of 1993 which was updated in 2016. This Act specifies a single tier system of sub-national government, made up of three types of Assemblies categorized by population size: Metropolitan, Municipal and District Assemblies[3]. There are therefore a total of 216 sub-national governments - 6 Metropolitan Assemblies or Metros, 56 Municipal Assemblies or MAs, and 154 District Assemblies or DAs. All of them have more or less the same mandate for administration and development planning.

9. ***The passage of the Local Governance Law marked the beginning of the government's comprehensive local government and decentralization program which has strengthened over time***. Other legislations were rolled out to deepen the range, scope and process of decentralization and local governance. The Government passed several additional political and administrative decentralization laws, which were harmonized into the Local Government Act of 2016[4]. In 2010, a new Decentralization Policy Framework was developed and Action Plans were adopted. This Framework clarified the mandates and responsibilities for national, regional, and local levels of government[5], with all local governments still having more or less the same mandates.

10. ***Financing to local governments accrues through the Government's intergovernmental fiscal framework, which is widely recognized as being coherent and consistent with fiscal decentralization principles.*** Today, the Government has a better understanding of how to tackle urban development challenges. Going forward, a second generation of rules that integrate incentives for urban management capacity, and finance for urban services are to be developed. Needless, these rules are expected to be to fully consistent with the existing financing framework.

C. Relationship to CAS/CPF

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[2] Article 241/3 and Article 240/2. Article 35/5d requires the state 'to take appropriate measures to ensure decentralization in administrative and financial machinery of government and to give opportunities to people to participate in decision-making at every level in national life and government'.

[3] Metropolitan Assemblies have a minimum population of 250,000 people, Municipal Assemblies 95,000 people, and District Assemblies 75,000 people.

[4] It synchronizes critical components of the provisions of Article 240 in the 1993 Republican Constitution namely fiscal decentralization (Acts 455, 462 and 658), political decentralization (Act 462), Decentralized Planning (Act 480); Administrative Decentralization (Act 656); Local Government Instrument, 2009 (Legislative Instrument 1961)

[5] National level - responsible for policy making, planning evaluation and monitoring; Regional level - responsible for coordination and harmonization of the plans and programs of local government entities; and Local level as the legislative, administrative, development planning, budgeting, rating and service delivery authorities

11. The new Country Partnership Framework will be based on the Strategic Country Diagnostic (SCD) underway[6]**,** and this operation will be aligned with the CPF.

II. Program Development Objective(s)

A. Program Development Objective(s)

12. Program Development Objective (PDO) is to "***improve urban governance and basic urban services in participating municipal assemblies***".

B. Key Program Results

13. The program, will focus on two results areas: (i) improved institutional and governance performance of participating municipal assemblies, and (ii) improved basic urban services. These results are linked to support to be provided under the Program, and is summarized in Section III: Program Boundary below.

14. **The proposed key PDO indicators are:**

i. number of beneficiaries of participating MAs with improved access to municipal services under the Program (Corporate indicator)
ii. percent of participating MAs with improved institutional performance as per the annual performance assessment targets (to measure governance).
iii. percent of participating MAs delivering municipal services funded under the program as per the annual work plan targets (to measure service delivery).
iv. Adoption of the improved intergovernmental fiscal transfer system (IGFTS) and timely allocation and release of resources to MAs.

15. There will be four DLIs linked to the PDO: DLI 1: focusing on the MAs having the minimum institutional capacity to access the grants under the Program, DLI 2: measuring MAs Institutional Performance improvements in good urban governance and delivery of urban services; DLI3: measuring the actual deliver of municipal services against an approved work plan; DLI4 . tracking timely allocation and release of resources to MAs. Disbursement Linked Indicators (DLIs) 1 – 3 are linked to PDO indicators (ii) and (iii) above, while DLI 4 is linked to PDO Indicator (iv).

16. Nine intermediate indicators are proposed to measure behavior change. These are:

National:

i. Timely allocation and release of performance and capacity support grant (MoF)
ii. Timely assessment and announcement of annual performance assessment results (MLGRD)
iii. Strengthening the capacity of the Urban Development Unit (UDU) under MLGRD.

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[6] The SCD will be informed by the following: (i) Ghana Urbanization Review (2015); (ii) Urban Development and Infrastructure (Municipal) Financing (2016); (iii) Metropolitan Management at Greater Accra (2016), (iv) Enhancing Urban Resilience in Accra (2017)

iv. Timely delivery of Institutional and capacity support to 56 MAs (OHLGS)

Regional:

v. Technical back-up support to MMAs (RCCs)
vi. Environmental/social support and timely approval and issuance of certificates to MAs by the Environment Protection Agency (EPA)

Local:

vii. Percentage increase in internally generated funds (IGF)
viii. Number of citizen consultations[7]
ix. Number of MAs with functional client service units (which largely record and address grievances).

III. Program Description

A. PforR Program Boundary

Government Program

15. ***The main institutions that have key roles in implementing Ghana's decentralization program are the Ministry of Finance (MoF) and the Ministry of Local Government and Rural Development (MLGRD).*** The operations of the Program can be summarized as follows: MoF allocates a 7.5 percent of national revenues and deposits these in a fund known as the District Assembly Common Fund (DACF) – this fund is managed by an administrator appointed by the President. MoF also allocates about US$20.0 million[8] to a second line of financing under the MLGRD, known as the District Development Fund (DDF) – this fund is managed by a secretariat (known as DDF Secretariat) under the MLGRD. The DDF Secretariat undertakes annual performance assessments and releases funds in accordance with them. Administrative decentralization is managed by the MLGRD while capacity building activities for the local governments are executed by the Office of Head of Local Government Services (OHLGS) which assigns technical staff to each of the ten Regional Coordination Councils (RCCs) so they can help local governments with technical aspects like engineering, social, environment, procurement etc. Analytic work undertaken by MLGRD is done by a unit called Urban Development Unit (UDU), which also writes guidelines, manuals etc.

16. ***Ghana's fiscal decentralization program supports local governments to execute local development plans and deliver on their mandates.*** This support moves through two funds: (i) a transfer from the District Assembly Common Fund (DACF) Administrator, and (ii) a performance based grant known as the District Development Fund (DDF) managed by the MLGRD.

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[7] SPEFA/Town Hall meetings held (to promote good urban governance, transparency, accountability and citizen engagement)
[8] This allocation has been fluctuating over the last few years, and has been a factor in delays.

i. The first fund (DACF) administered by the DACF Administrator[9], accrues to 216 sub-national governments (MMDAs). Financed by 7.5% of the national revenues, the DACF prioritizes annual transfers in accordance with 4 criteria in the formula approved by Ghana's Parliament, which are: need factor; equalizing factor; responsive factor; and service pressure factor.[10]

ii. The second fund (DDF) administered by the DDF Secretariat under MLGRD, also accrues to 216 sub-national governments (MMDAs). It consists of three grants: The Basic Grant which is 20% of the total DDF, the Performance Grant which is 68% of the total DDF (and the largest portion of the transfer), and a Capacity Building Grant which is 12% of the DDF. It should be noted that of the latter, the Capacity Building Grant, 60% goes directly to the districts (finances demand driven capacity building), while 40% goes to the two entities (DDF Secretariat and OHLGS) that undertake performance assessments, as well as the delivery of supply-driven capacity building activities through the Regional Coordination Councils (RCCs) and also directly to local governments. These performance assessments are known as the Functional and Organizational Assessment Tool – FOATs, and are conducted by independent consultants recruited for that purpose.

17. The country wide implementation of the program has been successful in consolidating and harmonizing resources from various sources for capacity building and local service delivery, and it is the DDF into which resources of IDA's proposed program will be disbursed (see table below).

Grant	Proportion	Allocation
Basic Grant (20%)	Equal share (38%)	Allocate to all MMDAs that fulfil all the MCs
	Population (31%)	
	Poverty Index (31%)	
Performance Grant (68%)	FOAT results (100%)	The amount allocated to each district is the ratio of a district' score to the total score of districts that met all MCs and weig with the basic grant score.
Capacity Building Grant (12%)	Supply driven (40%)	Allocate to DDF Secretariat and OHLGS to implement suppl driven capacity building activities and FOAT assessment.
	Demand driven (60%)	Allocate equally to all MMDAs to address their capacity gaps identified by the FOAT

18. ***There are five main issues with the government's decentralization program which make it unresponsive to the growing needs of secondary cities***. *First*: both funds, DACF and DDF, are unpredictable and often delayed, making it impossible for local governments to plan, budget, and achieve satisfactory budget execution rates, thereby affecting their performance assessments. When performance assessments are poor, local governments are penalized the next year. *Second:* significant delays in receiving funds by MLGRD for their DDF Secretariat, delays the conduct of the performance assessments, which in turn delays the recruitment of independent consultants that undertake assessments in each local government. Ultimately these delays impact

[9] DACF Administrator is appointed by the President and reports to the Parliament.

[10] e.g. the formula for 2016 was weighted as follow: need factor: 44%; equalizing factor: 40%; responsive factor: 12%; and service pressure factor: 4%.

disbursements to local governments, e.g. the 2015 allocation was delayed by two years. *Third*: because of the equitable weight given by the first fund (DACF) to rural and urban areas, urban areas get a lower per capita transfer (US$4.30) than rural areas (US$6.40). The system is effectively unresponsive to the growing needs of secondary cities. *Fourth*: almost 50% or more of the first fund (DACF), i.e. 50% of the 7.5% of national revenues, is earmarked for national priority programs, thereby reducing the resources that are transferred to 216 local governments to about 27% of the total transfer pool[11]. *Fifth*, because the system has been largely effective with respect to capacity building over the last eight years (financed by the second fund, the DDF), almost 90% of the local governments today are compliant with the low bar of annual performance assessments, and there is no incentive for local governments to further improve performance.

19. ***The Government intends to refine the current fiscal transfer program by merging in essence the two current funds (DACF and DDF).*** There will be only one pool of funds to support local jurisdictions (DACF), and the criterion for accessing grants based on performance, will be strengthened. MLGRD thus will remain responsible only for performance assessments and capacity building, but will not in the future be passing any funds to local governments.

Proposed GSCSP Program boundary

20. ***This Ghana Secondary City Support Program (GSCSP) builds on the systems established under LGCSP, and refines mechanisms to enable a focus on urban management and urban development in secondary cities.*** Under the LGCSP, as part of DDF framework, two lines of support, known as Urban Development Grant (UDG) and Capacity Support Fund (CSF) were earmarked for 46 local governments, including metropolitan and municipal assemblies - the number of local governments in 2017 has increased to 62. These two grants were provided in addition to the funds that accrued to local governments from the DDF, and appropriately supported the government's fiscal decentralization and overall local government capacity building program, and were not intended to be a tool for urban development. This proposed program is intended to support a "second generation" of UDGs in addition to the existing CSFs.

21. ***This operation of US$150.0 million would be a slice of the Government decentralization program of fiscal and institutional support for 56 local governments, excluding the 6 metros.*** Although only 36 of these 56 local governments are more than 50 percent urbanized, the government classifies all 56 as "municipal assemblies". Criterion for targeting local governments will be developed during preparation for this "second generation" of support. Three rounds of second generation of UDGs and CSFs will be allocated over 2019-2022.

22. Boundaries of the Government program (DDF), LGCSP and the proposed Program (GSCSP) is presented in table below.

Design	***DDF***	***LGCSP***	***Proposed GSCSP***

[11] Urbanization Review: Raising through cities in Ghana, World Bank, 2015.

Parameters		*(UDG)*	*US$150.0m (UDG)*
Scope/Coverage	216 MMDAs	46MMAs	Option 1. 56 MAs Option 2. 36 MAs (above 50% urban population)
FOAT Assessment	FOAT	FOAT + 5 key reform areas[12]	FOAT + urban management performance assessment
Fund Utilization sector	Education; Health	Education; Economic; Sanitation; Health; Roads; Water	Economic infrastructure; Network infrastructure; Waste management
Investment Amount	**US$61.45m** (2011)[13]	**US$140.00 m**[14] (LGCSP)	**US$40m per year**
Per capita allocation per year	US$6.86 (2011)	US$4.56 (2016)	US$ 8.27 (option 1, per urban capita) US$ 9.97 (option 2, per urban capita)
Result areas/ indicators	(i) Mobilize additional financial resources for MMDAs; (ii) Provide incentives for performance when complying with GoG legal and regulatory framework; (iii) Establish a link between performance assessments and capacity building support)	(i) Direct beneficiaries, of which female (ii) variance between allocations and actual receipts of DACF, DDF, and UDG; (iii) improvement in FOAT score; (iv) increase in citizen's engagement survey score	(i) Direct beneficiaries, of which female (ii)improved institutional performances of participating municipal assemblies in urban governance; (ii) improved basic urban services

23. ***The Program will finance US$120.0 million for (i) performance based grants and US$30.0 million for (ii) National and Regional capacity building.*** Both these are discussed below:

(i) Performance based grants (US$120.0 million) UDGs and CSFs: This portion of the program will support both investments and capacity building, i.e. second generation UDGs and CSFs. *UDGs* would be allocated to ensure allocations amounting to US$ 8.0 to US$10.0 per capita of the urban population of the 56 MAs, enabling them to make relatively more strategic investments than in the last generation of grants. Resources will be made available to 56 MAs on the basis of their DDF/FOAT performance measured against UDG-specific benchmarks[15]. Metropolitan

[12] Budgeting; Reporting and Auditing; Asset Management; Revenue Management; Social Accountability.
[13] AfD: US$6.3m; CIDA: US$15.0m; Danida: US$11.4m; KfW:US$8.75m; GoG: US$20m
[14] UDG Year1: US$10m; UDG Year 2:US$20m; UDG Year 3: US$28m; UDG Year 4: US$35m; UDG Year 5:US$47m
[15] These could be spatial and land use planning, the application of development controls, inter-jurisdictional coordination in metropolitan regions, the provision of municipal services and economic infrastructure, urban connectivity, etc.

Assemblies and District Assemblies would not be eligible for these grants[16]. Performance would be assessed both through the existing FOAT system as well as additional urban management performance assessment. Only MAs that achieve a FOAT score greater than the national average would qualify for UDGs. "Over and above" the regular DDF/FOAT assessment process, the UDG performance assessment system would cover urban governance and urban service delivery benchmarks to incentivize urban management and service delivery. MAs could use the UDGs to finance Economic infrastructure; Network infrastructure; and Waste management. Schools and Health facilities would be excluded, as these are financed from the DDF. *CSF*s will finance institutional and capacity for the 56 MAs on a demand-driven basis, and the FOAT assessments will guide the demand.

(ii) ***National and Regional capacity building (US$30.0 million)***: A set of parallel but related activities at national and regional level will be financed over three years. The activities will strengthen capacities of regional and national government to guide governance and service delivery improvements in 56 MAs. At the national level, National Government ministries would be supported in the development and implementation of relevant policy and regulatory frameworks in the urban space, as well as for setting service delivery standards and defining curricula for training. The beneficiaries of this will be MoF, the EPA, the DACF Administrator, and MLGRD, including its departments and agencies, specifically OHLGS, and UDU. At the regional level, technical assistance through the RCCs and the regional offices of the EPA to MAs.

24. ***IDA financing will be provided through disbursement linked indicators, 3 DLIs for MAs and 5 DLIs for national and regional governments.***

i. The 3 DLIs for 56 MAs will assess (i) the ability of the MAs to have and maintain the minimum institutional capacity to receive grants under the Program; (ii) institutional improvements of the capacity of the MAs for good urban governance as well as deliver of urban services; and (iii) the capacity to deliver actual urban services as per annual work plan. These DLIs will build on the existing performance assessment system (FOAT) and will aim to address the core of the PDO.
ii. The 5 DLIs for national and regional governments will assess the timeliness of their financial support as well as technical support to MAs, and are: (i) DLI 4: RCC support to MMAs, (ii) DLI 5: EPA support to MMAs, (iii) DLI 6: OHLGS support to MMAs and generic capacity support, (iv) DLI 7: DACF timely allocation and release of UDG and CSF, (v) DLI 8: MLGRD timely completion and announcement of FOAT as well as capacitating UDU. These DLIs incentivize regional and national government entities.

IV. Initial Environmental and Social Screening

25. Under the LGCSP, out of the 791 subprojects implemented, 109 safeguards instruments were prepared to address the Relevant environmental and social policies that were triggered. The

[16] Metropolitan and District Assemblies are too large to make visible improvements from the second generation UDgs. Besides, they have access to financing from other partners.

table below summarizes the information.

UDG Category	*No of MMAs*	*No of Sub-projects screened*	*No of sub-projects triggering safeguards*	*No of Safeguards Plans to be prepared*		
				ESMP[17]	*ARAP*	*RAP*
UDG-1	30	218	11	5	6	0
UDG-2	34	166	27	6	21	0
UDG-3	37	155	33	9	24	0
UDG-4	42	140	39	12	27	0
UDG-5	46	111	17	7	10	0
Total		**790**	**127**	**39**	**88**	

26. All Abbreviated Resettlement Action Plan (ARAP) recommendations have been fully complied with and all the PAPs have been handled, and MMAs have become more conscious of Safeguards issues under the LGCSP project. However, experience with the implementation of the UDG component of the LGCSP points to some challenges with ensuring compliance with the safeguards requirements of the country's own system and the safeguards policies of the World Bank. Some of these challenges have been the inadequacy of capacity to manage project induced risks and impacts at the MMAs. There is inadequate staffing at the MMAs with the requisite skills set to manage safeguards. Also, there have been frequent delays with the procedures and processes for accessing land for project interventions and the resultant compensation payments for assets affected by the project activities.

27. With respect to social safeguard, there is increased awareness and MMAs have made significant advances to comply with Social Safeguards policies. However, more still need to be done by MMAs with respect to grievance redress mechanism (GRM) and Resettlement Action Plan (RAP) compensation. The GRMs under the client service units at MMAs are not fully functional and accessible to the PAPs. The unit does not have dedicated officers to record grievances and how they are being resolved in a grievance log book. The absence of the functional GRM system in the MMAs client service units have hindered the capturing and reporting of such issues in all project progress reports to help identify potential problem areas before they escalate. MMAs currently do not prepare RAP/ARAP completion reports to indicate the achievements, outstanding issues and lessons learnt during the implementation.

28. To ensure that the PforR Program activities are sustainably implemented, an Environmental and Social Systems Assessment (ESSA) will be undertaken during project preparation. The Bank team will carry out the environmental and social system assessment (ESSA):

i. to identify any potential environmental and social effects of the Program and the capacity and performances of the responsible agencies to manage them effectively;
ii. on adequacy of the client's legal and regulatory framework;
iii. on improving existing arrangements, including stakeholder consultations and Grievance

[17] Environmental and Social Management Plan

Redress Mechanism, to enhance opportunities for resolving Program beneficiary concerns and provides feedback on activities.

iv. On maintaining an open and transparent approach to implementation of environmental and social mitigation measures, including public consultation and participation.

v. of existing measures that ensures social inclusion in program activities

29. The ESSA will inform the design of the Program with regard to any possible DLI on safeguards and/or additional actions in the PAP. Activities which will have high environmental and social risks will be excluded from the Program. The ESSA will be based on field level assessments of implementing entities. The draft ESSA will be disclosed by the Bank prior to appraisal and final disclosure of the ESSA report including agreed actions after appraisal.

V. Tentative financing

Source:		($m.)
Borrower/Recipient		TBC
IBRD		
IDA		150
Others (specify)		
	Total	150

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