

**INTEGRATED SAFEGUARDS DATA SHEET
ADDITIONAL FINANCING**

Report No.: ISDSA12576

Date ISDS Prepared/Updated: 14-May-2015

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I. BASIC INFORMATION

1. Basic Project Data

Country:	Kenya	Project ID:	P151660
		Parent Project ID:	P117635
Project Name:	Addl Financing - Kenya Water Security and Climate Resilience Project (P151660)		
Parent Project Name:	Kenya Water Security and Climate Resilience Project (P117635)		
Task Team Leader(s):	Eileen Rose Burke		
Estimated Appraisal Date:	13-Apr-2015	Estimated Board Date:	25-Jun-2015
Managing Unit:	GWADR	Lending Instrument:	Investment Project Financing
Sector(s):	General water, sanitation and flood protection sector (80%), Public administration- Water, sanitation and flood protection (20%)		
Theme(s):	Water resource management (80%), Natural disaster management (20%)		
Is this project processed under OP 8.50 (Emergency Recovery) or OP 8.00 (Rapid Response to Crises and Emergencies)?			No
Financing (In USD Million)			
Total Project Cost:	67.30	Total Bank Financing:	58.00
Financing Gap:	0.00		
Financing Source			Amount
BORROWER/RECIPIENT			5.80
International Development Association (IDA)			58.00
Korea WB Partnership Facility			3.50
Total			67.30
Environmental Category:	A - Full Assessment		

Is this a Repeater project?	No
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2. Project Development Objective(s)

A. Original Project Development Objectives – Parent

The project development objectives of KWSCR-1 are to: (i) increase availability and productivity of irrigation water for project beneficiaries; and (ii) enhance the institutional framework and strengthen capacity for water security and climate resilience for the country.

B. Proposed Project Development Objectives – Additional Financing (AF)

The PDOs of KWSCR-1 are to (a) increase availability and productivity of irrigation water for project beneficiaries and (b) enhance the institutional framework and strengthen capacity for water security and climate resilience in certain areas of the country.

Within the PDO, ‘capacity for water security and climate resiliency’ primarily includes improved water services, flood protection, and analytical capacity to understand and manage hydrological variability.

3. Project Description

The current KWSCR-1 includes the following three components:

- Component 1 Water Resources Development (US\$76.8 million) supports climate resilience and water security for economic growth by financing water investments and by building a longer-term investment pipeline. Component 1 includes: (i) implementation of an irrigation scheme in lower Nzoia, a flagship project of the Kenya Agricultural Sector Development Strategy (ASDS) and of Kenya Vision 2030; and (ii) identification and preparation of new investments, starting with the Mwache dam, expected to be financed by IDA through KWSCR-2.
- Component 2 Effective Water Sector Institutions (US\$56.3 million) supports the strengthening of current sector institutions, as well as reform activities. The component funds pre-reform transition and reform of the of the water sector to align with the devolution processes mandated by the 2010 Constitution of Kenya, as well as to improve the capacity and knowledge base for basin-level water resources management in Kenya. This component also includes strengthening the planning, analysis and licensing functions of the Water Resources Management Authority.
- Component 3 Support for Project Implementation (US\$15.2 million) supports the PMU to provide for effective KWSCR-1 implementation.

The following sub-components are added to the project under the AF:

- Activity 1.1.1.2: Lower Nzoia Flood Protection (US\$54 million in Additional Financing from IDA, plus \$3.5 million from TF). Proposed activities will include: (i) repair and improvement of existing dykes and construction of new dykes, culverts and drains to provide enhanced flood protection to the communities of the Lower Nzoia River; and (ii) strengthening of monitoring and community early warning mechanisms. The proposed flood mitigation dykes improvement works have been planned to protect residents' life and property, as well as the new irrigation scheme, including infrastructure and crops. The dykes have been designed based on an estimated 750 m³/sec flood flow which is equivalent for 30 year return period. New dike works comprise 5.8 km of new dykes and 28.4 km of improvement of existing dykes. The main works in the flood mitigation dykes component comprise of an earth embankment wall about 5.0 m high, which also provides a 5.0 m

wide road at the crest. Details are as follows:

Southern Dykes; 17.1 km

- Realigning sections of the dykes; New dykes 4.7 km
- Raise and strengthen the existing dykes; 12.4 km

Northern Dykes; 17.1 km

- Realigning sections of the dykes; New dykes 1.1 km
- Raise and strengthen the existing dykes; 16.0 km

Provide filter drains on new and existing dykes

Provision of 8 gates at specific locations on northern dyke

A flood early warning system exists for the Lower Nzoia River, and flood forecasting is conducted daily by the Kenya Meteorological Authority, which is part of the MEWNR. Through the project, the flood early warning system will be improved, in order to minimize damage to life and property in the event of a flood. If funding is obtained from a World Bank Trust Fund, the flood early warning system will include the combination of IT and river water management technology. It could possibly include for real-time monitoring of hydraulic data, including CCTV and containment action for flood events through the early warning broadcasting based on alarm criteria. Other potential improvements could include: installation of hydraulic measuring devices, including water level gauges and rainfall sensors; flood analysis (including inundation mapping) and refinement of flood warning criteria for Lower Nzoia River; establishment of customized control system with monitoring system; and technology transfer and knowledge sharing.

- Activity 1.1.1.3: Nzoia Watershed Management (US\$4 million). Proposed activities include planning and implementation of watershed management activities throughout the Nzoia watershed, with a goal of improving livelihoods through the promotion of sustainable land management practices; and reduction of sediment loads in the lower Nzoia watershed. The highest erosion hotspots will be identified and watershed management activities will be implemented in these areas, potentially including soil conservation, improved grazing and cropping patterns, terracing, gully repair and construction of small works to reduce erosion, and other needed community entry-point and livelihood activities.

- Activity 1.1.2: Program for the Improvement of Water Services in Mombasa County. (US \$25 million in IDA Financing reallocated from Sub-components 1.2 and 2.1). Activities will include the design and implementation of the first phase of a program for the reduction and management of non-revenue water for implementation by Mombasa Water and Sanitation Company (MOWASCO), as well as other activities to increase the institutional capacity of MOWASCO and Mombasa County. Future phases beyond this financing will be sought from other sources, including a potential new World Bank financed project.

This sub-component will support the implementation of a non-revenue water (NRW) reduction program mainly by rehabilitating and expanding the tertiary distribution network, and to a limited extent the primary and secondary network including the establishment of District Metering Areas . This activity is aimed at drastically reducing NRW in selected areas to contribute in improving MOWASCO's operational and financial performance. The activity will follow International Water Association (IWA) recommendations—on the need to measure flows of water being dispatched and consumed by customers to improve services, and will identify and fix leaks in the tertiary distribution network, and eliminating illegal connections.

Further, the project will build on ongoing MOWASCO pilot work in 8 DMAs.

4. Project location and salient physical characteristics relevant to the safeguard analysis (if known)

The Lower Nzoia Flood Protection project is located in Bunyala district, Western Kenya. The current dykes have a total length of about 34.09 km comprising 17.0 km on the southern and 17.09 km on the northern side. The construction, operation and decommissioning phases of the project are likely to have some adverse impacts on both the local community and surrounding environment. While project designs have not been finalized, a census showed that land taking for the Flood Protection project activities could affect 1,163 households, encompassing 4,482 individuals. Of this, a total of 225 residential structures could be affected. The remainder of households would be affected by land-take or need to relocate non-residential structures for the expansion of dykes or right-of-way

For the improvement of water services in Mombasa County, construction is expected to install new or replace existing secondary and tertiary distribution networks as well as installation of water meters. Environmental and social impacts resulting from such construction works are site specific, expected to be easily manageable, will be included in EMPs that will be prepared in accordance with the KWSCR Environment and Social Management Framework.

5. Environmental and Social Safeguards Specialists

John Bryant Collier (GENDR)

Mary C.K. Bitekerezo (GSURR)

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>An EIA and EMP have been developed, consulted upon and disclosed before appraisal for the Lower Nzoia Irrigation Scheme Phase 1, as well as for the Nzoia Flood Protection activities, detailing the mitigation measures required under this sub-investment.</p> <p>Additionally, as part of the preparation of an Investment Framework for the Water Sector being prepared by the project, MEWNR prepared an Environmental and Social Management Framework (ESMF) that establishes the environmental criteria for selecting investments, the detailed procedures for preparing the environmental assessments necessary for those investments, as well as the details of potential impacts and suggested mitigation measures for the kinds of activities envisaged by the project.</p>
Natural Habitats OP/BP 4.04	Yes	<p>Some of the wetlands in the project area may be affected by project activities and related infrastructure. For this reason, the Natural Habitats policy is triggered. The project will strive to retain the ecological functions of the wetlands, which include water purification, flood protection, habitat for aquatic animal and plant species. The ESMF and ESIA include guidance on mitigation measures.</p>

Forests OP/BP 4.36	No	While the policy does not apply to the currently identified investments, as the investments being prepared under Component 1.2 could be located in forested areas, the forestry policy will be looked at during the preparation of the relevant safeguard documents for those investments. If the policy is triggered, a Tier-1 Restructuring will be prepared. The forestry policy has also been considered in the preparation of the ESMF.
Pest Management OP 4.09	Yes	<p>Although the project will not be financing pesticide, the Lower Nzoia Irrigation Scheme will involve use of different types of agrochemicals to control diseases and pests. The project will promote the use of integrated pest management approaches and seek to reduce reliance on synthetic chemical pesticides. An Integrated Pest Management Plan (IPMP) has been included in the ESMF to provide guidance on the pest and pesticide management under the Lower Nzoia Scheme. The IPMP provides guidance on assessment of environmental and health risks associated with the current or envisaged pesticide use and integration of specific measures to these risks in the project design.</p> <p>Additionally, an Integrated Pest Management Framework (IPMF) is being prepared that will establish the detailed procedures for preparing the pest management plans, as and when necessary, for those investments selected under the Investment Framework.</p>
Physical Cultural Resources OP/BP 4.11	Yes	Location of cultural heritage resources are not yet fully known. The ESIA's for the subprojects will address impacts on physical cultural resources and provide a cultural resources management plan, including "Chance Finds". As the investments being prepared under Component 1.2 could be in areas with cultural heritage resources, this policy will be looked at during the preparation of the relevant safeguard documents for those investments. The policy has also been considered in the preparation of the ESMF.
Indigenous Peoples OP/BP 4.10	Yes	<p>There are no Vulnerable or Marginalized Groups (VMG) in the Lower Nzoia Irrigation Scheme or Flood Activity regions.</p> <p>However, since the project is also preparing an Investment Framework for the Water Sector, a Vulnerable and Marginalized Groups Framework (VMGF) was prepared in accordance to the World Bank's Policy on Indigenous Peoples (OP 4.10).</p>

<p>Involuntary Resettlement OP/BP 4.12</p>	<p>Yes</p>	<p>A Resettlement Action Plan (RAP) for the Lower Nzoia Irrigation Scheme has been prepared. With respect to loss of assets, according to the RAP, in total 81 structures will be affected including 17 residential units and 28 commercial units. There are Approximately 1871 households (995 farms) will be affected and a total of about 135.3 hectares of land will be acquired. In addition, 564 vulnerable people are affected. The RAP, which was prepared in close consultation with the affected people, provides a detailed plan on to how to mitigate these impacts and to ensure scheme sustainability and livelihoods benefits.</p> <p>Lower Nzoia Flood Control Project: a draft RAP has been prepared, consulted upon and disclosed for the project. While project designs have not been finalized, a census showed that land taking for the Flood Protection project activities could affect 1,163 households, encompassing 4,482 individuals. Of this, a total of 225 residential structures could be affected. The remainder of households would be affected by land-take or need to relocate non-residential structures for the expansion of dykes or right-of-way. The ESIA and RAP provide for capacity building for the lower level implementing agencies to handle environmental and social management issues.</p> <p>As the project is also preparing an Investment Framework for the water sector, a Resettlement Policy Framework (RPF) was prepared based on the Kenyan laws and the OP 4.12. The RPF establishes the criteria for selecting investments, the detailed procedures and processes for preparing the investment specific Resettlement Action Plans (RAPs) necessary for those investments, as well as the details of potential impacts and suggested mitigation measures. Once investments are identified, feasibility studies will determine the extent of impacts on people and land.</p>
<p>Safety of Dams OP/BP 4.37</p>	<p>No</p>	<p>The Safety of Dams policy is not triggered by the Lower Nzoia Irrigation Scheme, as it does not involve constructing dams or using existing dams.</p>
<p>Projects on International Waterways OP/BP 7.50</p>	<p>Yes</p>	<p>The Lower Nzoia Irrigation Scheme is in the Lake Victoria Basin, which is part of the Nile River Basin; therefore, notification was made in 2013 to all Nile Riparians under the Projects on International Waterways Policy.</p>

		An updated OP 7.50 notification is being made for the proposed flood control infrastructure.
Projects in Disputed Areas OP/BP 7.60	No	N/A

II. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues

<p>1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:</p> <p>The AF to KWSCRIP-1, has been assigned Environment Assessment Category A like its parent project. It triggers the following Safeguard Policies: Environmental Assessment OP/BP 4.01, Indigenous Peoples OP/BP 4.10, Involuntary Settlement OP/BP 4.12, Pest Management OP/BP 4.09, Physical Cultural Resources OP/BP 4.11, Natural Habitats OP/BP 4.04, and Projects on International Waterways OP 7.50.</p> <p>KWSCRIP Additional Financing is expected to have positive benefits through investments that increase water storage for productive use and increase resilience to floods and droughts. However, the Lower Nzoia Flood Protection infrastructure may result in adverse environmental and social impacts. Potential adverse impacts may include loss of land or structures, loss of critical habitats, interruption to migratory patterns, displacement of people, loss of access to areas for livelihood support and public safety issues. For the Nzoia Flood Control Infrastructure, a draft Environment and Social Impact Assessment (ESIA) and a draft Resettlement Action Plan (RAP) have been prepared, consulted upon and disclosed. Further, the original project ESMF, RPF, and VMGF have also been updated to include activities in Mombasa County, and re-disclosed both in country and at the Bank Infoshop.</p> <p>Social analysis carried out and detailed in the ESIA indicates that there are no indigenous groups/vulnerable and marginalized groups living in the Lower Nzoia Project area.</p>
<p>2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:</p> <p>N/A</p>
<p>3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.</p> <p>Several alternatives to the proposed flood control infrastructure and to World Bank financing for the Lower Nzoia Flood Control activities were considered. Through the Western Kenya Community Driven Development and Flood Preparedness Project funded by the World Bank, over fifteen potential options for coping with the Lower Nzoia Floods were assessed based on technical viability, financial, social and environmental costs through a participatory process. The option of rehabilitation of existing dykes and construction of new dykes was chosen by the communities and by the Government as the optimal solution. Before implementation begins, the designs for the Nzoia dykes and irrigation will be jointly optimized and reviewed to minimize and address environmental and social impacts.</p>
<p>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.</p> <p>Lower Nzoia Flood Control Project: a draft ESIA, ESMP and a draft RAP have been prepared for the project. These documents explain the project's environmental and social impacts and provide</p>

detailed mitigation measure to ensure sustainability and compliance with GoK's regulations and legislations, as well as with World Bank social and environmental policies. While project designs have not been finalized, a census showed that land taking for the Flood Protection project activities could affect 1,163 households, encompassing 4,482 individuals. Of this, a total of 225 residential structures could be affected. The remainder of households would be affected by land-take or need to relocate non-residential structures for the expansion of dykes or right-of-way. The ESIA and RAP provide for capacity building for the lower level implementing agencies to handle environmental and social management issues.

For the Improvement of Water Services in Mombasa County, the details of works are not yet available by appraisal and therefore an ESMF, RPF and VMGF have been prepared and disclosed. The frameworks will guide the preparation of the relevant plans by MOWASCO once the civil works have been designed. The frameworks also include capacity building activities for the relevant implementing agencies.

Generally, experience in Kenya has shown incremental safeguards capacity in the relevant PIUs and therefore their strengthening is required and the project will take measures to build the required capacity. Training programs will target capacity issues related to the implementation of the social and environmental management plan and the resettlement plan. The World Bank team has been working closely with the safeguards team preparing the above documents to ensure they comply with the relevant World Bank policies and will carry out close, field-based implementation support and supervision.

The PMUs constituted under Component 3 of the parent project has core roles in fiduciary (procurement and financial management) aspects, environmental and social safeguards supervision, management and coordination, reporting, monitoring and evaluation. The PMU would include social and environmental safeguards specialists, and will be responsible for ensuring the application of the EIA, RAP and social and environmental frameworks (ESMF, VMGF and RPF) and supervising the implementation of safeguards instruments.

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

Potential stakeholders are found at national, regional and catchment levels, including WRUAs, farmers, municipalities, county governments, national ministries, civil society, and others. The ESIA, RAP and the frameworks detail the stakeholder consultation process for their preparation, disclosure and implementation.

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other	
Date of receipt by the Bank	31-Jan-2013
Date of submission to InfoShop	01-Feb-2013
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	19-Mar-2013
"In country" Disclosure	
Kenya	13-Feb-2013
<i>Comments:</i> An updated version of the ESMF was disclosed by the Infoshop and in country on 25-Feb-2015.	
Resettlement Action Plan/Framework/Policy Process	

Date of receipt by the Bank	12-Feb-2013
Date of submission to InfoShop	13-Feb-2013
"In country" Disclosure	
Kenya	13-Feb-2013
<p><i>Comments:</i> A revised Framework was disclosed by the World Bank and in country on 18-Mar-2015.</p> <p>A draft RAP for the Nzoia Flood Protection Infrastructure was disclosed by the World Bank and in Kenya on April 21, 2015.</p>	
Indigenous Peoples Development Plan/Framework	
Date of receipt by the Bank	12-Feb-2013
Date of submission to InfoShop	13-Feb-2013
"In country" Disclosure	
Kenya	13-Feb-2013
<p><i>Comments:</i> A revised Framework was disclosed by the World Bank and in country on April 10, 2015.</p>	
Pest Management Plan	
Was the document disclosed prior to appraisal?	Yes
Date of receipt by the Bank	////
Date of submission to InfoShop	////
"In country" Disclosure	
Kenya	13-Feb-2013
<p><i>Comments:</i> If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.</p>	
If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.	
If in-country disclosure of any of the above documents is not expected, please explain why:	

C. Compliance Monitoring Indicators at the Corporate Level

OP/BP/GP 4.01 - Environment Assessment	
Does the project require a stand-alone EA (including EMP) report?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
OP/BP 4.04 - Natural Habitats	
Would the project result in any significant conversion or degradation of critical natural habitats?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]

If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
OP 4.09 - Pest Management	
Does the EA adequately address the pest management issues?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Is a separate PMP required?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
If yes, has the PMP been reviewed and approved by a safeguards specialist or PM? Are PMP requirements included in project design? If yes, does the project team include a Pest Management Specialist?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
OP/BP 4.11 - Physical Cultural Resources	
Does the EA include adequate measures related to cultural property?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
OP/BP 4.10 - Indigenous Peoples	
Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit or Practice Manager?	Yes [<input type="checkbox"/>] No [<input type="checkbox"/>] NA [<input checked="" type="checkbox"/>]
OP/BP 4.12 - Involuntary Resettlement	
Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
OP 7.50 - Projects on International Waterways	
Have the other riparians been notified of the project?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
If the project falls under one of the exceptions to the notification requirement, has this been cleared with the Legal Department, and the memo to the RVP prepared and sent?	Yes [<input type="checkbox"/>] No [<input type="checkbox"/>] NA [<input checked="" type="checkbox"/>]
Has the RVP approved such an exception?	Yes [<input type="checkbox"/>] No [<input type="checkbox"/>] NA [<input checked="" type="checkbox"/>]
The World Bank Policy on Disclosure of Information	
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
All Safeguard Policies	

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have costs related to safeguard policy measures been included in the project cost?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]

III. APPROVALS

Task Team Leader(s):	Name: Eileen Rose Burke	
<i>Approved By</i>		
Practice Manager/ Manager:	Name: Alexander E. Bakalian (PMGR)	Date: 27-May-2015