

# Appraisal Environmental and Social Review Summary Appraisal Stage (ESRS Appraisal Stage)

Date Prepared/Updated: 04/01/2020 | Report No: ESRSA00512

Apr 01, 2020 Page 1 of 11

Afghanistan COVID-19 Emergency Response and Health Systems Preparedness Project (P173775)

#### **BASIC INFORMATION**

### A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Afghanistan	SOUTH ASIA	P173775	
Project Name	Afghanistan COVID-19 Emergency Response and Health Systems Preparedness Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Health, Nutrition & Population	Investment Project Financing	3/13/2020	3/17/2020
Borrower(s)	Implementing Agency(ies)		
The Islamic Republic of Afghanistan	Ministry of Public Health		

#### Proposed Development Objective(s)

The project development objective is to respond to, and mitigate the threat posed by COVID-19 and strengthen national systems for public health preparedness in Afghanistan.

Financing (in USD Million)

Total Project Cost

100.40

## B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

## C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The project will address critical country-level needs for preparedness and response for COVID-19. It will fill critical financing gaps that have been identified due to the new emergency preparedness and response needs created by COVID-19. The project financing amount is US\$100.4 million, with US\$19.4 million from the World Bank COVID19 Fast-Track Facility and US\$81 million from the Afghanistan Regular IDA18 allocation. The combined IDA financing for Afghanistan will be on a Grant basis. The scope of this project will be nationwide, covering all 34 provinces of the country. The project comprises the following components:

Apr 01, 2020 Page 2 of 11

Afghanistan COVID-19 Emergency Response and Health Systems Preparedness Project (P173775)

Component 1: Emergency COVID-19 Response: The aim of this component is to slow down and limit as much as possible the spread of COVID-19 in the country. This will be achieved through providing immediate support to enhance disease detection capacities through increasing surveillance capacities, provision of technical expertise, strengthening laboratory and diagnostic systems to ensure prompt case finding and local containment.

Component 2: Health Care Strengthening: The aim of this component is to strengthen essential health care service delivery to be able to provide the best care possible for people who become ill despite a surge in demand. It will also ensure ongoing support for people ill in the community to minimize the overall impact of the disease on society, public services and on the economy.

Component 3: Mitigation of Social Impact: This component will address significant negative externalities expected in the event of a widespread COVID-19 outbreak and include comprehensive communication strategies. The primary focus will be on addressing social distancing measures such as avoiding large social gatherings and should the need arise, school closings to mitigate against the possible negative impacts on children's learning and wellbeing.

Component 4: Implementation Management and Monitoring and Evaluation: Support for the strengthening of public structures for the coordination and management of the project would be provided, including central and local (decentralized) arrangements for coordination of activities, financial management and procurement. This component would also support monitoring and evaluation of prevention and preparedness, building capacity for clinical and public health research, and joint-learning across and within countries. As may be needed, this component will also support third-party monitoring of progress.

Component 5: Contingent Emergency Response Component (CERC): In the event of an Eligible Crisis or Emergency, the project will contribute to providing immediate and effective response to said crisis or emergency.

Given the uncertainties associated with the scale and trajectory of the COVID19 outbreak, approximately 10 percent of the resources are unallocated but will be available for reallocation to the project components as needed to enable rapid redeployment within the project depending on the specific needs that may arise.

#### D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social] This emergency operation has been prepared as a new stand-alone project which will be implemented throughout Afghanistan and will contribute to COVID-19 surveillance and response. The specific locations where project subcomponents will be implemented have not yet been identified but will be implemented in urban as well as remote areas (including border areas and areas of ongoing communal conflicts). No major civil works are expected in this project; if any works are supported, they should be minor and take place in existing facilities within existing footprints. However, should there be a need for major refurbishments and/ or construction of any new structures, Environmental and Social Management Plans (ESMPs) will be prepared based on the provisions of the Environmental and Social Management Framework (ESMF) prepared for the World Bank–funded Sehatmandi Project (P160615) and the design should consider international protocols for infectious control and medical waste management. The project is not expected to impact natural habitats, indigenous peoples or cultural sites.

D. 2. Borrower's Institutional Capacity

Apr 01, 2020 Page 3 of 11



Afghanistan COVID-19 Emergency Response and Health Systems Preparedness Project (P173775)

The Bank has prior experience working with the Afghanistan Ministry of Public Health (MoPH) through the SEHAT and Sehatmandi projects; therefore, it is expected that the ESF requirements of the proposed emergency project will be adopted easily by the borrower. The institutional mechanism and capacity at MoPH for handling social safeguards/ standards has improved during the implementation of the Sehatmandi Project through increased citizen engagement and community feedback mechanisms. The staff assigned by MoPH for the implementation of the ESMF for the Sehatmandi Project will also be responsible for the implementation of the ESMF and SEP for the proposed project. A follow-up capacity evaluation will be conducted during project implementation and, if needed, additional E&S specialists will be assigned for the proposed COVID-19 project.

#### II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

#### A. Environmental and Social Risk Classification (ESRC)

High

#### Environmental Risk Rating

High

The project will have positive environmental and social impacts, insofar as it should improve COVID-19 surveillance, monitoring and containment. The environmental risks are nonetheless considered High because of the current uncertainty around project location and specific activities, occupational health and safety and the issue of medical waste management. The main environmental risks are: (i) the occupational health and safety issues related to testing and handling of supplies and the possibility that they are not adequately used by the laboratory technicians and medical crews; and (ii) medical waste management and community health and safety issues related to the handling, transportation and disposal of healthcare waste. Wastes that may be generated from labs, quarantine facilities and screening posts to be supported by the COVID-19 readiness and response could include liquid contaminated waste (e.g. blood, other body fluids and contaminated fluid) and infected materials (water used; lab solutions and reagents, syringes, bed sheets, majority of waste from labs and quarantine and isolation centers, etc.) which requires special handling and awareness, as it may pose an infectious risk to healthcare workers in contact or handle the waste. It is also important to ensure that sharps are properly disposed of.

Given that Afghanistan has limited experience in managing highly infectious medical wastes such as COVID-19, the project will require that appropriate precautionary measures are planned and implemented. To mitigate the above-mentioned risks the Ministry of Public Health will update, during project implementation, the existing ESMF prepared for the Sehatmandi Project by adding to it WHO standards on COVID-19 response. This updated ESMF will include a Health Care Waste Management Plan. Until the updated ESMF has been approved, the project will apply the existing ESMF.

Social Risk Rating High

The social risks are also considered High. The central social risk is that marginalized and vulnerable social groups are unable to access facilities and services, which could undermine the objectives of the project. To mitigate this risk the MoPH, in the ESCP, will commit to the provision of services and supplies based on the urgency of the need, in line with the latest data related to the prevalence of the cases. MoHP will also use the existing stakeholder engagement mechanism in the Sehatmandi Project to engage citizens and for public information disclosure while they update it to include more information on the environmental and social risks of the project activities and new modalities that take into account the need for social distancing. The updated SEP will also include an updated Grievance Redress Mechanism for addressing any concerns and grievances raised.

Apr 01, 2020 Page 4 of 11



#### B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

#### **B.1. General Assessment**

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

#### Overview of the relevance of the Standard for the Project:

The project will have positive environmental and social impacts as it should improve COVID-19 surveillance, monitoring and containment. However, the project could also cause significant environmental, health and safety risks due to the dangerous nature of the pathogen and reagents and other materials to be used in the project-supported laboratories and quarantine facilities. Multiple disadvantaged or other vulnerable groups stand to benefit, starting with the elderly and those with compromised immune systems due to pre-existing conditions. Healthcare-associated infections due to inadequate adherence to occupational health and safety standards can lead to illness and death among health and laboratory workers. The laboratories and relevant health facilities which will be used for COVID-19 diagnostic testing and isolation of patients can generate biological waste, chemical waste, and other hazardous byproducts. The laboratories to be supported by the project will process COVID-19 and will therefore have the potential to cause serious illness or potentially lethal harm to the laboratory staff and to the community, so effective administrative and containment controls will be put in place so minimize these risks. Environmentally and socially sound health facilities management will require adequate provisions for minimization of occupational health and safety risks, proper management of hazardous waste and sharps, use of appropriate disinfectants, proper quarantine procedure for COVID-19, appropriate chemical and infectious substance handling and transportation procedures, etc. In line with WHO Interim Guidance (February 12,2020) on "Laboratory Biosafety Guidance related to the novel coronavirus (2019-nCoV)", COVID-19 diagnostic activities and non-propagative diagnostic laboratory work (e.g. sequencing) could be undertaken in BSL2 labs with appropriate care. Any virus propagative work (e.g. virus culture, isolation or neutralization assays) will need to be undertaken at a containment laboratory with inward directional airflow (BSL-3 level).

To mitigate these risks, the Ministry of Public Health (MoPH) will update the existing Environmental and Social Management Framework (ESMF) including its related Health Care Waste Management Plan (HCWMP) prepared for the Sehatmandi Project. This will provide for the application of international best practices in COVID-19 diagnostic testing and handling the medical supplies, disposing of the generated waste, and road safety. This updated ESMF will have an exclusion list for project activities that may not be undertaken unless the appropriate OHS capacity and infrastructure is in place (e.g., BSL3 level). Until the updated ESMF has been approved, the Project will apply the existing ESMF and the HCWMP in conjunction with WHO standards on COVID-19 response. International best practice is outlined in the WHO "Operational Planning Guidelines to Support Country Preparedness and Response", which should be followed in updating the documents. Further guidance is included in the WHO "Key considerations for repatriation and quarantine of travelers in relation to the outbreak of novel coronavirus 2019-nCoV" (February 11, 2020).

One obvious type of social risk related to this kind of an operation is that marginalized and vulnerable social groups are unable to access facilities and services designed to combat the disease, in a way that undermines the central objectives of the project. To mitigate this risk MoPH, in the ESCP, will commit to the provision of services and supplies based on the urgency of the need, in line with the latest data related to the prevalence of the cases.

Apr 01, 2020 Page 5 of 11



Afghanistan COVID-19 Emergency Response and Health Systems Preparedness Project (P173775)

Beyond this, project implementation needs also to ensure appropriate stakeholder engagement, proper awareness raising and timely information dissemination to (i) avoid conflicts resulting from false rumors; (ii) ensure equitable access to services for all who need it; and (iii) address issues resulting from people being kept in quarantine. The project can thereby rely on standards set out by WHO as well as international good practice to (1) facilitate noted appropriate stakeholder engagement and outreach towards a differentiated audience (concerned citizens, suspected cases and patients, relatives, health care workers, etc.); and (2) promote the proper handling of quarantining interventions (including dignified treatment of patients; attention to specific, culturally determined concerns of vulnerable groups; and prevention of Sexual Exploitation and Assault (SEA) and Sexual Harassment (SH) as well as minimum accommodation and servicing requirements).

#### **ESS10 Stakeholder Engagement and Information Disclosure**

Once approved, the project will establish a structured approach to stakeholder engagement and public outreach that is based upon meaningful consultation and disclosure of appropriate information, considering the specific challenges associated with combating COVID-19. In addition to updating of the existing ESMF for the WB-funded Sehatmandi Project in line with the provisions of the ESCP, the client will prepare and disclose an updated Stakeholder Engagement Plan (SEP) during implementation.

The updated SEP will acknowledge the particular challenges with engaging marginalized and vulnerable social groups such as ethnic and religious minorities, internally displaced persons (IDPs), returnees, pastoral nomads (Kuchis), drug addicts and persons with disabilities, especially those living in remote or inaccessible areas, while keeping a clear focus on those who are most susceptible to the transmission of the novel coronavirus, such as the elderly and those with compromised immune systems due to pre-existing conditions. Stakeholder engagement strategies will point out ways to minimize close contact and follow the recommended good hygiene procedures as outlined in the US-Center for Disease Control (CDC) for patients with confirmed COVID-19 or persons under investigation for COVID-19 in healthcare settings. People affected by or otherwise involved in project-supported activities, including different types of health care workers, will be provided with accessible and inclusive means to raise concerns or lodge complaints, via the Grievance Redress Mechanism (GRM) included in the SEP. Beyond this, project implementation will need to be underlain by a strong and well-articulated broader project communication strategy, which will not only help with the implementation of the community mobilization and behavioral change objectives of Component 1, but also help in a broader sense to tamp down on false rumors about COVID-19, to ensure equitable access to services, and to counteract the isolation and uncertainty that comes from people being kept in quarantine.

#### **B.2. Specific Risks and Impacts**

A brief description of the potential environmental and social risks and impacts relevant to the Project.

#### **ESS2 Labor and Working Conditions**

Most activities supported by the project will be conducted by health and laboratory workers, i.e. civil servants employed by Ministry of Public Health. Activities encompass thereby treatment of patients as well as assessment of samples. The key risk is contamination with COVID-19 (or other contagious illnesses as patients taken seriously ill with COVID-19 are likely to suffer from illnesses which compromise the immune system, which can lead to illness and death of workers). The project will ensure the application of OHS measures as outlined in WHO guidelines which will

Apr 01, 2020 Page 6 of 11



Afghanistan COVID-19 Emergency Response and Health Systems Preparedness Project (P173775)

be captured in the updated ESMF. This encompasses procedures for entry into health care facilities, including minimizing visitors and undergoing strict checks before entering; procedures for protection of workers in relation to infection control precautions; provision of immediate and ongoing training on the procedures to all categories of workers, and post signage in all public spaces mandating hand hygiene and personal protective equipment (PPE); ensuring adequate supplies of PPE (particularly facemask, gowns, gloves, handwashing soap and sanitizer); and overall ensuring adequate OHS protections in accordance with General EHSGs and industry specific EHSGs and follow evolving international best practice in relation to protection from COVID-19. Also, the project will regularly integrate the latest guidance by WHO as it develops over time and experience addressing COVID-19 globally.

The use of child labor will be forbidden in accordance with ESS2, i.e. due to the hazardous work situation, for any person under the age of 18. The project may outsource minor works to contractors. The envisaged works will thereby be of minor scale and thus pose limited risks, but workers will have access to necessary PPE and handwashing stations. Also, no large-scale labor influx is expected due to the same circumstance. In line with ESS2, prohibited is the use of forced labor or conscripted labor in the project, both for construction and operation of health care facilities. The project will also ensure a basic, responsive grievance mechanism to allow workers to quickly inform management of labor issues, such as a lack of PPE and unreasonable overtime via the Ministry of Public Health.

#### **ESS3 Resource Efficiency and Pollution Prevention and Management**

Medical wastes and chemical wastes (including water, reagents, infected materials, etc.) from the labs, quarantine, and screening posts to be supported (drugs, supplies and medical equipment) can have significant impact on environment and human health. Wastes that may be generated from medical facilities/ labs could include liquid contaminated waste, chemicals and other hazardous materials, and other waste from labs and quarantine and isolation centers including of sharps, used in diagnosis and treatment. Each beneficiary medical facility/lab, following the requirements of the ESMF and the HCWMP to be updated for the Project, WHO COVID-19 guidance documents, and other best international practices, will prepare and follow the updated Health Care Waste Management Plan (HCWMP) to prevent or minimize such adverse impacts. The ESMF will include guidance related to transportation and management of samples and medical goods or expired chemical products. Resources (water, air, etc.) used in quarantine facilities and labs will follow standards and measures in line with US-Center for Disease Control (CDC) and WHO environmental infection control guidelines for medical facilities.

#### **ESS4 Community Health and Safety**

In line with safety provisions in ESS2, it is equally important to ensure the safety of communities from infection with COVID-19. As noted above, medical wastes and general waste from the labs, health centers, and quarantine and isolation centers have a high potential of carrying micro-organisms that can infect the community at large if they are is not properly disposed of. There is a possibility for the infectious microorganism to be introduced into the environment if not well contained within the laboratory or due to accidents/ emergencies e.g. a fire response or natural phenomena event (e.g., seismic). The updated HCWMP therefore will describe:

- how project activities will be carried out in a safe manner with (low) incidences of accidents and incidents in line with Good International Industry Practice (WHO guidelines)
- measures in place to prevent or minimize the spread of infectious diseases.
- emergency preparedness measures.

Apr 01, 2020 Page 7 of 11



Laboratories, quarantine and isolation centers, and screening posts, will thereby have to follow respective procedures with a focus on appropriate waste management of contaminated materials as well as protocols on the transport of samples and workers cleaning before leaving the work place back into their communities. The project will thereby follow the provisions outlined in the ESMF, HCWMP and noted in ESS1.

The operation of quarantine and isolation centers needs to be implemented in a way that both the wider public, as well as the quarantined patients are treated in line with international best practice as outlined in WHO guidelines referenced under ESS1. This includes the following requirements:

- Infrastructure: there is no universal guidance regarding the infrastructure for a quarantine facility, but space should be respected not to further enhance potential transmission and the living placement of those quarantined should be recorded for potential follow up in case of illness.
- Accommodation and supplies: quarantined persons should be provided with adequate and culturally-appropriate food and water, appropriate accommodation including sleeping arrangements and clothing, protection for baggage and other possessions, appropriate medical treatment, means of necessary communication if possible, in a language that they can understand and other appropriate assistance. Further information is also included in the CDC Interim Infection Prevention and Control Recommendations for patients with confirmed COVID-19 or persons under investigation for COVID-19 in Healthcare Settings.
- Communication: establish appropriate communication channels to avoid panic and to provide appropriate health messaging so those quarantined can timely seek appropriate care when developing symptoms.
- Respect and Dignity: quarantined persons should be treated, with respect for their dignity, human rights and fundamental freedoms and minimize any discomfort or distress associated with such measures, including by treating all quarantined persons with courtesy and respect; taking into consideration the gender, sociocultural, ethnic or religious concerns of quarantined persons.

Some project activities may give rise to the risk of Gender Based Violence (GBV), in particular Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) risks. The ESMF to be updated for this project will include a GBV risk assessment and preventive measures, in the form of a GBV Action Plan, will be prepared and implemented if found pertinent. The project will promote the avoidance of SEA by relying on the WHO Code of Ethics and Professional Conduct for all workers in the quarantine facilities as well as the provision of gender-sensitive infrastructure such as segregated toilets and enough light in quarantine and isolation centers.

The project will also ensure via the above noted provisions, including stakeholder engagement, that quarantine and isolation centers and screening posts are operated effectively throughout the country, including in remote and border areas, without aggravating potential conflicts between different groups, including host communities and refugees/IDPs.

In case quarantine and isolation centers are to be protected by security personnel, it will be ensured that the security personnel follow a strict code of conduct and avoid any escalation of situation, taking into consideration the above noted needs of quarantined persons as well as the potential stress related to it.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Apr 01, 2020 Page 8 of 11



Afghanistan COVID-19 Emergency Response and Health Systems Preparedness Project (P173775)

This standard is currently considered Not Relevant. The project is not expected to support construction or rehabilitation works of any sizable extent. Should any such activities come to be included--for example, as part of the establishment of local isolation units or quarantine wings in hospitals--they will be undertaken in existing facilities and within established footprints. Any restrictions on land use undertaken or imposed in connection with project implementation will be undertaken through voluntary negotiations between the parties, to the extent possible. In the unlikely event of permanent land acquisition in connection with any project activities that have not yet been identified (for example, as a result of use of the unallocated funding in Component 6), the necessary ESF instruments, satisfactory to the Bank, will be prepared and disclosed prior to commencement of the land acquisition.

#### ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

No major construction or rehabilitation activities are expected in this project and all works will be conducted within existing facilities. Hence, likely impacts of the project on natural resources and biodiversity are low and so this standard is considered Not Relevant.

#### ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

This standard is considered Not Relevant as there are no people in Afghanistan meeting the criteria in ESS7 for IP/SSAHUTLC.

#### **ESS8 Cultural Heritage**

This standard is currently considered Not Relevant as the project is not expected to support any construction or rehabilitation activities that would involve the movement of earth (thereby potentially having an impact on tangible cultural heritage), or other activities that could have an impact on intangible cultural heritage. In the unlikely event of construction or the movement of earth in connection with any project activities that have not yet been identified (for example, as a result of use of the unallocated funding in Component 6), a chance finds procedure will be prepared and integrated into the updated ESMF for the project.

#### **ESS9 Financial Intermediaries**

This standard is Not Relevant for the suggested project interventions, as no financial intermediaries will be used.

#### C. Legal Operational Policies that Apply

#### **OP 7.50 Projects on International Waterways**

No

#### **OP 7.60 Projects in Disputed Areas**

No

#### III. BORROWER'S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Apr 01, 2020 Page 9 of 11

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
ESS 1 Assessment and Management of Environmental and Social Risks and Impacts	
The ESMF prepared for Sehatmandi Project shall be updated within 30 days after the Effectiveness Date. Activities which involve establishment of isolation centers, involving any type of construction work and activities requiring ESMF screening cannot start before the ESMF is consulted and disclosed and other environmental and social assessments (if required after screening) are in place.	09/2020
ESS 10 Stakeholder Engagement and Information Disclosure	
The Stakeholder Engagement Plan (SEP) shall be updated within 30 days after the Effectiveness Date.  The SEP will then be continuously updated during project implementation, as needed.	09/2020
ESS 2 Labor and Working Conditions	
Labor Management Plan. The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association, including through, inter alia, implementing adequate occupational health and safety measures.	11/2020
ESS 3 Resource Efficiency and Pollution Prevention and Management	
Relevant aspects of this Standard shall be considered as needed, including, inter alia, measures to: manage health care wastes, and other types of hazardous and non-hazardous wastes.	11/2020
ESS 4 Community Health and Safety	
Relevant aspects of this standard shall be considered as needed, including, inter alia, measures to minimize the potential for community exposure to communicable diseases.	11/2020
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	
ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	
ESS 8 Cultural Heritage	

B.3. Reliance on Borrower's policy, legal and institutional framework, relevant to the Project risks and impacts

#### Is this project being prepared for use of Borrower Framework?

**ESS 9 Financial Intermediaries** 

No

#### Areas where "Use of Borrower Framework" is being considered:

There are no areas where the use of the Borrower Framework is being considered; the project will apply the ESF.

Apr 01, 2020 Page 10 of 11

**World Bank** 

**IV. CONTACT POINTS** 

Contact: Francisca Ayodeji Akala Title: Senior Health Specialist

Telephone No: 5232+3349 / Email: fakala@worldbank.org

Contact: Ghulam Dastagir Sayed Title: Senior Health Specialist

Telephone No: 5232+3342 / Email: gsayed@worldbank.org

Contact: Habibullah Ahmadzai Title: Health Specialist

Telephone No: 5232+3361 Email: hahmadzai@worldbank.org

Borrower/Client/Recipient

Borrower: The Islamic Republic of Afghanistan

Implementing Agency(ies)

Implementing Agency: Ministry of Public Health

#### V. FOR MORE INFORMATION CONTACT

The World Bank 1818 H Street, NW Washington, D.C. 20433

Telephone: (202) 473-1000

Web: http://www.worldbank.org/projects

#### VI. APPROVAL

Task Team Leader(s): Francisca Ayodeji Akala, Ghulam Dastagir Sayed, Habibullah Ahmadzai

Practice Manager (ENR/Social) Valerie Hickey Cleared on 24-Mar-2020 at 20:12:51 EDT

Safeguards Advisor ESSA Nina Chee (SAESSA) Concurred on 01-Apr-2020 at 15:46:25 EDT

Public Disclosure

Apr 01, 2020 Page 11 of 11