Project Information Document/
Identification/Concept Stage (PID)

Concept Stage | Date Prepared/Updated: 02-Oct-2018 | Report No: PIDC162859

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BASIC INFORMATION

A. Basic Project Data

Project ID P167988	Parent Project ID (if any)	Environmental Assessment Category C - Not Required (C)	Project Name IMPROVING HOUSEHOLD SURVEYS AND ADMINISTRATIVE DATA IN SUDAN: STATISTICAL
			CAPACITY BUILDING
Region	Country	Date PID Prepared	Estimated Date of Approval
AFRICA	Sudan	02-Oct-2018	
Financing Instrument	Borrower(s)	Implementing Agency	Initiation Note Review Decision
Investment Project Financing	Ministry of Finance and Economic Planning	Central Bureau of Statistics	The review did authorize the preparation to continue

PROJECT FINANCING DATA (US\$, Millions)

CI	INA	ΜΔ	DV

Total Project Cost	0.50
Total Financing	0.50
Financing Gap	0.00

DETAILS

Non-World Bank Group Financing

Trust Funds	0.50
Trust Fund for Statistical Capacity Building	0.50

B. Introduction and Context

Country Context

After a few years of economic turmoil following the secession of South Sudan in July 2011, Sudan's economy has stabilized somewhat, with Gross Domestic Product (GDP) growing 5.4 percent in 2015 and with an inflation rate of 16.9 percent. Services contributed about half of GDP in 2016, followed by agriculture and industry (31.6 and 17.1 percent respectively). Outside of oil products, agro-processing, such as cotton ginning and the production of sugar and edible oils, is an important contributor to the industry

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sector. Sudan is considered a lower middle-income country, with annual GDP per capita reaching US\$2,735 in 2016 (PPP). However, resources are unevenly distributed and the national poverty level is 36.1 percent (2014/15). The current population is approximately 41.98 million (2018 estimate), of which 67 percent lives in rural areas.

Substantial changes have occurred as a result of the secession of South Sudan including the loss of human and land resources and three quarters of the country's oil wealth. The loss of oil revenues resulted in a decline in Government revenues by 24.9 percent, and caused a balance of payments shock. About 263,000 people from South Sudan and about 98,000 from Eritrea are refugees or asylum seekers. In addition, an estimated 3.2 million people are internally displaced (IDPs) as a result of conflict, and live mainly in the Darfur region.

The Government of Sudan (GoS) has adopted a Five-Year Program for Economic Reforms (2015-2019) and a comprehensive reform program to address the economic and financial situation. There is a need for deep reductions in public expenditures but also for continued public investments for development and growth, as well as for reorienting the economy to agriculture, livestock and industry as the main engines of growth. Investments in human capital and infrastructure have been limited in the past and institutional capacity is low, constraining growth and reforms.

Sudan suffers from high external indebtedness and sizeable external arrears. At the end of 2013, Sudan's external debt stock stood at \$45.1 billion in nominal terms, about 85 percent of which was in arrears to several creditors, including the World Bank. The country is eligible for debt relief under the Highly-Indebted Poor Countries Initiative (HIPC) and the Government has committed to improve the allocation of budgetary resources with a view to promoting poverty reduction. The Bank, in close collaboration with the IMF and others, is providing advice on the process of debt relief as well as on economic and social policies, but there is need for close monitoring of the implementation of these policies and assessment of their outcomes - mainly social - to convince creditors to move forward with debt relief.

Prevalence of poverty and inequality and marked spatial disparities in poverty incidence. The last poverty assessment for Sudan, using the 2009 Household Budget Survey (HBS), shows that nearly half of the Sudanese population lives in poverty. While inequality at national level appears to be moderate, with a GINI coefficient estimated at about 35, there seems to be important disparities in living conditions and poverty incidence between geographic regions. Poverty is more pervasive in the rural areas and particularly concentrated in conflict affected regions, where the poverty rate approximates 70 percent against 26 percent only in Khartoum. The prevalence and persistence of poverty and spatial disparities are driven by limited and high disparities in terms of access to natural resources and basic services, lack of economic diversification and over-dependence on the extractive sector, and inadequate infrastructure services. Governance failures and economic uncertainty compromised the enabling environment for private sector investment, business development and employment creation. Besides, Sudan ranks poorly in human development, 171 out of 187 according to the 2013 UNDP Human Development Index and the county's prospects for meeting MDGs by 2015 are bleak.

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The Government of Sudan is currently working on a Poverty Reduction Strategy which involves thinking through issues of inequality/social imbalances and economic diversification. At the same time there are key constraints in statistical data availability to inform policy-making in both areas. It is therefore that this project lays out a series of activities that aim to strengthening the statistical system in Sudan to better supply relevant information and data in the areas of crucial concern to manage the transition: inequality/social monitoring and economic diversification through agriculture.

Sectoral and Institutional Context

The Statistics Act of 2003 assigns to the Central Bureau of Statistics (CBS) the responsibility to provide national statistics. The semi-autonomous CBS has branch offices in all the states of Sudan. Lower levels of government are also tasked to produce statistics and CBS is expected to provide them with technical guidance, including the coordination of statistical work. Large-scale household surveys and population and housing censuses are conducted by CBS (see Table 1), while compilation of administrative data (such as school and hospital statistics) is done by government ministries, departments and agencies (MDAs).

Several activities in statistics have been undertaken recently. In 2008, the CBS conducted the fifth national population and housing census, which is held every ten years. Additionally, a series of national surveys were administered during the past ten years, and included a Multiple Indicator Cluster Survey (MICS) in 2000, 2010 and 2014. In 2003, Sudan's Ministry of Industry, the Central Bureau of Statistics and UNIDO together conducted an Industrial Establishments' Survey, the results of which were published in 2005. It was recommended that this survey should be carried out every five years, but due to lack of funding this target was missed in 2010. In 2007, a short household expenditure survey was carried out to determine the consumption patterns for the CPI estimation.

CBS conducted national Household Budget Surveys in 2009 and 2014/15, with the financial support of the African Development Bank (AfDB). The results of the 2009 survey led to the first ever reliable poverty estimates in Sudan in 2010/11. The World Bank Poverty Profiles produced from the survey formed an integral part of Sudan's work on an Interim Poverty Reduction Strategy, formally launched on 22 November 2012. Prior to these, there was an HBS survey carried out in 1978.

In the social sectors, a Household Health Survey was carried out in 2006, providing comprehensive baseline health and nutrition data for the whole of Sudan over a period of about twenty years. A second round of this Household Health Survey (SHHS2) was carried out in 2010 by the Federal Ministry of Health, the Central Bureau of Statistics, and the Ministry of Health together with the Southern Sudan Commission for Census, Statistics and Evaluation. In the same year, an integrated Public Expenditure Tracking Survey was administered in the health sector together with the World Bank, the results of which were used to prepare the first Public Expenditure Tracking Study in Sudan.

Table 1: Main Statistical Surveys carried out since 2000 (completed)

Survey Name	Date
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Multiple Indicator Cluster Survey (MICS)	2000, 2010, 2014
Social Services Survey	2003
Comprehensive Industrial Survey	2003
Household Health Survey	2006 & 2010
Quick Household Consumption Survey	2007
The National Baseline Household Survey	2009
Household Health Utilization and Expenditure Survey	2009
Labor Force Survey	2011
National Household Budget and Poverty Survey (NHBPS)	2014/2015
Core Welfare Indicators Questionnaire	2014/2015

Table 2: Surveys/Censuses Planned for 2018-2020, include

Survey Name	Date	
Household Budget Survey	2019	
Comprehensive Agricultural Census	2018/2019	
(including Livestock and Crops)		
Agriculture Survey	2018/2019	
Multiple Indicator Cluster Survey 6 (MICS)	2019	
Financial Inclusion Survey	2019	
Industrial Sector Survey	2019	
Population and Housing Census	2021	

Note: CBS is starting the preparatory phase of the Comprehensive Agricultural and the Population and Housing censuses, however the funds for conducting these surveys have not been secured yet and the implementation period remains uncertain.

Comparability issues between 2009 and 2014/15 poverty surveys

While household-level consumption data was also collected during the 2014/15 National Household Budget and Poverty Survey (NHBPS), these data are not directly comparable to the 2009 National Baseline Household Survey data. One challenge in establishing trends in poverty and shared prosperity in the Sudanese context is that the two surveys that the 2009 and 2014/15 surveys differ in three important respects: first, recall periods for major food items were changed from seven days in 2009 to 10 days in 2014/15. Second, the 2014/15 survey features a more detailed consumption aggregate. For instance, the 2008 survey only captures four different food items under the header 'milk, cheese, and eggs' while the 2014/15 survey captures nine. Third, the timing of interviews differed, giving rise to concerns about seasonal biases. Appropriate adjustments could be devised to ensure data comparability. The first adjustment would

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correct for the change in recall periods from seven days to ten days. The second adjustment would correct for differences in the consumption schedule. An adjustment for this applied to the 2009 data would be based on overlap in the consumption items recorded. The third adjustment will correct for differences for potential seasonal bias. The 2009 survey was conducted in a different month than all of the 2014/15 survey rounds. This can introduce a seasonal bias when comparing the 2009 estimates with new estimates. However, the latest survey was fielded over several months and this can be exploited to estimate seasonal effects. While adjustments could be made to try to analyze trends between the two periods, the issue of comparability does not disappear completely. Thus, there is a need to establish a baseline/benchmark survey methodology that is consistent with international best practices.

Administrative data are limited in Sudan

Administrative data are usually useful in complementing household survey data in any country. The need for administrative records is even stronger for countries such as Sudan with very limited household surveys. However, administrative records are also very hard to come by in Sudan. For example, better planning in the health sector requires to know how many health facilities are available to people in different locations, how many trained health officers are there, and so on. The same applies to other sectors. With regard to education, it is important to know whether or not schools are availability in various communities, to know the number of trained teachers, types of school infrastructure, and so on. Such information is currently not properly documented and organized for easy use. This project would help to improve availability of administrative data for the health and education sectors.

Sudan has weak coordination of statistical data within government agencies. This may partly be because of inadequate capacity at both the federal and state levels. Limited financial resources has resulted in heavy reliance on donors funding with limited resources for ensuring sustainable improvements in quality and capacity. The system is also hampered by the absence of policies or plans for dissemination. Besides, the Statistics Act of 2003 lacks explicit definitions of the NSS and of the specific roles of the component subsystems to ensure the good coordination and integration of the national system. The Act does not sufficiently articulate the role of CBS vis-à-vis the components of the sub-systems and does not empower CBS enough to perform its supervisory role of the NSS. A comprehensive review of this Statistics Act is planned under the new NSDS.

CBS, with the help of UNDP, set up a National Strategy for the Development of Statistics (NSDS) as a framework for strengthening statistical capacity for the period 2012 to 2016. The NSDS covers the entire national statistical system and aims to:

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- Strengthen the production of quality and timely statistics in line with international best practices and guidelines;
- Review the Statistics Act of 2003 to cover the establishment and mandate of the NSS.
- Improve the coordination and promote integration and collaboration among and between data producers and users;
- Strengthen national capacity to produce, analyze, and use reliable statistics generated by an integrated NSS;
- Ensure the long-term sustainability of the NSS by securing funding for priority data production, analysis, and dissemination.

The NSDS is in line with current demand to inform Government policy priorities. The focus on improving the quality, use and timeliness of socio-economic data and filling the gaps in economic statistics to inform an economic diversification strategy is consistent with part of the NSDS main objectives. For instance, the NSDS identified inadequacies in data development and dissemination resulting in lack of quality and relevant statistics, under-coverage of data items, absence of coordination of the data production process and deficient dissemination mechanisms, which undermines evidence-based policy and decision making. As for crucial economic data, the NSDS shows that national accounts are currently compiled annually but using the outdated SNA68. It should be noted that the 2012 to 2016 NSDS was not fully implemented during its listed time frame and is currently being updated.

Well-designed and implemented activities under the NSDS can help to spark the "data revolution", which was called for in UN Post-2015 Development Agenda. This requires both strengthening the government's ability to use new technologies and ICT tools for enhancing data collection and Monitoring & Evaluation processes and building local capacity for data management and analysis. ICT use will contribute to improve data quality and timeliness, while the development of capacities and skills will enhance the production of accurate and meaningful statistics to inform development policy.

Relationship to CPF

Addressing capacity constraints in statistics is an integral part of the Interim Strategy Note (ISN) that was discussed at the Bank Board in September 2013, and the ongoing PRSP. The activities suggested to be financed by the TFSCB are explicitly mentioned in the ISN. They are also consistent with Government policy priority areas in the NSDS. The GoS is fully committed and currently coordinating with other development partners to join efforts for statistical capacity building.

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Supporting the Bank's twin goals of ending extreme poverty and ensuring shared prosperity, also facilitating monitoring of progress towards the SDGs. The development of national statistical capacity and data quality in Sudan is in line with the focus on measurable results in the World Bank objectives of ending extreme poverty by 2030 and promoting shared prosperity. It will contribute also to improving the availability and reliability of important statistics for tracking the progress of Sustainable Development Goals (SDGs), supporting the preparation of the full Poverty Reduction Strategy Paper (PRSP).

C. Project Development Objective(s)

Proposed Development Objective(s)

The objective of the project is to strengthen the capacity of the Central Bureau of Statistics to improve the quality of household poverty survey data and availability of administrative data in education and health sectors by making existing administrative data more available.

Key Results

The main result of this project is to build the capacity of CBS to design and implement household surveys that are consistent with international best practices, as well as to be able to analyze the data and disseminated them in line with open data policies. The project is also expected to help improve availability of administrative data in education and health sectors in Sudan.

D. Preliminary Description

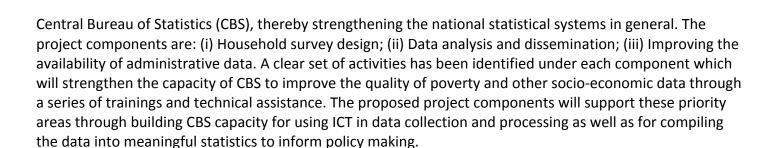
Activities/Components

1. Description

Many developing countries are now benefiting from World Bank loans/grants to implement statistical development projects for strengthening their national statistical systems, with a long-term vision. Unfortunately, the economic sanctions and Sudan's limited access to concessional development financing due to the external debt, makes it difficult to have such a project now. Hence, Sudan's statistical work would rely on donor trust funds. Until Sudan can become eligible again for World Bank loans and set up a more comprehensive project to strengthen its statistical systems (as other countries), it is important to continue to provide support to Sudan through trust funds. This would ensure that Sudan is not be left behind in terms of producing good quality statistics that are fundamental for policy making and monitoring of progress towards national and international development goals (including SDGs, and poverty reduction goals). This fits in very well with the "leave no one behind" theme for this TFSCB Call for Proposals.

The proposed project has three core components and a project management component to facilitate project implementation. The core components are designed to help strengthen the statistical capacity of Sudan

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Component 1: Improving the quality of household poverty survey data

The Household Budget Survey (HBS) is the official source of poverty and other social indicators in Sudan. CBS implemented HBS 2009 and 2014/15 with funding support by African Development Bank (AfDB). However, significant shortcomings have been identified in HBS 2014/15 that make it non-comparable with HBS 2009. These include the following. *Seasonality*: The 2009 survey was conducted in a different month than all of the rounds of the new survey. This can introduce a seasonal bias when comparing the 2009 estimates with new estimates. *Food Recall*: The 2014/15 survey has a food recall period of 10 days instead of 7 days. This implies that different weekdays are covered by the recall depending on the weekday of the interview. In Sudan, consumption is usually higher on Fridays. Thus, households interviewed between Wednesday and Friday are likely to have higher consumption than other households. *Consumption Aggregate*: The 2014/15 survey includes 49 additional food items and 71 additional non-food items compared to the 2009 survey. Even though the previous survey included 'other' items to capture consumption of any items not included, it can be assumed that those additional items were under-reported.

While attempts can be made to address the quality and comparability issues between the last two surveys, CBS has requested the World Bank to support Sudan with designing and implementing a new household survey that is consistent with international best practices. Discussions are ongoing regarding implementing a new household survey in Sudan, which will become the benchmark survey that follows international best practices (as opposed to the 2014/15 survey). CBS is interested in working with the World Bank to prepare and implement a new survey. The World Bank is working to help secure funding for the survey, which will provide updated poverty and welfare statistics. This will inform a new Economic Development Plan in 2020 as well as World Bank engagements in Sudan.

In preparation for a new survey, a clear set of activities have been identified which will strengthen household survey capacity of CBS. The support through the TFSCB funding will be focused on strengthening CBS capacity to prepare and implement the survey in a more cost-effective manner through a series of technical assistance engagement. The following areas of support have been identified:

Poverty survey and measurement methodology. The first step will be to hold discussions with CBS
and agree on the methodology for collecting poverty (consumption) data and measuring poverty in
Sudan. The agreed methodology will be documented and will be used for the next household survey,
serving as a benchmark going forward.

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- 2. **Training on multi-topic household survey design**. This will involve training on the entire process of conducting a survey, from preparation through implementation to dissemination. The project will support CBS to design of a new survey that will be a benchmark survey going forward, following recommended international best practices. For example, for the next survey information on food consumption will be collected using a *7-day recall* method rather than 10 days as was done in 2014/15. The survey will be designed to collect data on new indicators relevant to multiple sectors, aimed at gaining a better understanding of the root causes of poverty as well as a better evaluation of the progress towards the SDGs.
- 3. **Training on sampling design**: HBS 2014/15 included about twelve thousand households, but CBS believes that there were some issues of representativeness at the State levels. Technical assistance will be provided to improve the sampling design and representation at geographical levels.
- 4. Survey modernization using CAPI. CBS plans to move from paper to modernized surveys. One of the envisaged aspects of modernization of the national systems of survey data collection is the introduction of Computer Assisted Personal Interview (CAPI) system in Sudan. CAPI technology can significantly reduce the time lag between data collection and data analysis, dramatically improve data quality, and reduce survey costs. The ability to integrate household survey data with GPS coordinates, sensor data, time stamps, audio/video recordings and more opens up new and greater possibilities of tackling innovative, policy-relevant questions. CBS recently used CAPI (Survey Solutions) for the pilot agricultural production survey, and they staff express satisfaction with Survey Solutions, requesting comprehensive training on this application. However, the process of moving CBS to this new technology, and ensuring sustainability at the level of CBS requires significant capacity building by CAPI experts in addition to peer-to-peer learning opportunities. The proposed support on CAPI consists of: (a) training and workshops; (b) working with the IT staff from CBS on setting up the survey system infrastructure (c) helping in the design and testing of the CAPI household survey instruments including real-time consistency checks, supervisor and enumerator supervision, and new ways to deal with measures and standards; (d) supervision in conducting survey pilot; (e) purchase of tablets; (f) training on GIS.
- 5. **Pilot household survey:** A pilot survey will be implemented based on the new (benchmark) methodology. This is to ensure that CBS staff put into practice the skills acquired from trainings received on the various aspects of survey design and implementation using CAPI. The sample size and areas of coverage for the pilot study will be discussed during project appraisal. The preliminary idea is to use a sample that includes both rural and urban areas to verify that the new techniques and methodologies that will be introduced work throughout the country, particularly in rural settings.

Component 2: Improving capacity for data analysis, report writing and dissemination

This component comprises three sets of hands-on training activities related to data analysis and dissemination and an advanced training course in English.

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- 1. **Basic data analysis and reporting**. Currently, CBS has limited capacity to analyze the data they collect and prepare reports. This will include training in cleaning and compiling the survey data. The activities will include the preparation of a standard approach for data cleaning and quality assurance and the production of a fully documented and replicable procedure for data verification, error checking and correction etc. This activity will require acquisition of statistical software (such as Stata and SPSS) and relevant ICT equipment including computers. CBS staff will also be trained on using ADePT for socioeconomic data analysis.
- 2. **Poverty measurement.** The project will train CBS in the poverty estimation methodology, including the estimation of the consumption aggregates, price indicators, and poverty line.
- 3. Data Dissemination: Open access (open data) to anonymized data is key to enable evidence-based policy making and social accountability. It also helps statistics producers to justify budget allocations, which is essential for the sustainability of the project. The project will support the development of data access and information policies and dissemination practices, especially the dissemination of micro-data by financing: (i) the formulation and adoption of data dissemination and microdata access policies and calendar; (ii) the maintenance of CBS website to include a micro-data portal access in line with open-data principles; (iii) technical assistance and some trainings on micro-data anonymization; (iv) the improvement and maintenance of CBS website; and (v) training on SQL (Structured Query Language), one of the world's most popular databasing language, for mastering the basics of querying databases.
- 4. **Advanced English course for CBS staff.** This would help to improve the writing skills of CBS staff, which is useful for report writing. It would also facilitate work on World Bank projects, particularly for staff using World Bank procurement and finance systems (STEP and Client Connection).

Component 3: Improving statistical coordination and availability of administrative data in education and heath sectors

CBS leads in the production and dissemination of national official statistics while it guides the sectoral statistical systems in producing high quality statistics in their domains through development of standards in concepts, definitions, classifications and methodologies. CBS focuses on surveys and censuses as sources to generate indicators while it supports government ministries, departments and agencies (MDAs) in developing and improving system of Administrative Statistics.

Administrative registers are essential elements in the statistical production process. Administrative registers contain data records that have been created as a byproduct of an administrative process. While administrative data has not been created to serve statistical purposes per se, it can be of tremendous value in the statistical production process. Either to supplement the universe from which statistical samples can be drawn, or by using administrative data as proxies for the phenomena that would otherwise be examined

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through sample surveys. Some of the benefits of using administrative records include: reduced response burden, cost reductions compared to expensive field surveys, potentially shorter lag times from reference period to dissemination, wide coverage, etc.

CBS needs assistance to help resolve the coordination problems between CBS and statistics-producing MDAs to produce relevant economic and social statistics (administrative data) and disseminate statistical products and services at the national and subnational levels, that could be used for tracking public programs' performance. These coordination problems may result in the duplication of efforts and low-quality statistics with contradictory estimates. This project aims to address these issues through the provision of trainings and technical assistance for CBS and MDAs, as well as modern communication and information technologies and support for CBS to ensure a better coordination among the different statistics producing entities.

The key objective of this component is to improve the availability of administrative data on selected key indicators in education and health sectors, by making existing administrative data more available. The main activities and expected outputs include the following.

Activities (and outputs)

- 1. The aim is to focus on two sectors of priority to allow to achieve some benefits quickly in the short term. Discussions with CBS led to selection of education and health as focus sectors. Lessons learned from this project could later be used to scale up this activity to include administrative data in other sectors.
- 2. Identify related public programs and associated indicators of interest. For example, indicators (based on administrative data) that would allow to monitor progress towards achieving targets of the poverty reduction strategy and Sustainable Development Goals.
- 3. Asses the availability and quality of existing administrative data (for selected indicators), and develop a plan for improvement.
- 4. Document and disseminate administrative data. Selected administrative records will be improved through the application of the DDI standard (already adopted by the CBS) for data documentation (metadata), geographic reference, and the merging with other administrative records when feasible. Basic monitoring tools will be developed to help the Ministries of Education and Health, and the Central Government to track performance of selected public interventions. Tools includes quality assessment of indicators and administrative records, as well as the development of basic score cards systems. A workshop will be organized to share lessons learned from this activity with stakeholders.

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- 5. Training for capacity building. Training sessions will be provided to CBS and MDAs staff to assess the quality of administrative data and indicator and define improvements plans. Also, identified staff in selected Ministries (and local consultants) will be trained to support this work.
- 6. A User satisfaction assessment will be undertaken, if possible, by conducting a user satisfaction survey at the beginning and at the end of the project. Individual interviews (e.g. paper questionnaires or online interviews with SurveyMonkey) and focus group discussions will be considered. This will allow to access the impact of the activity.
- 7. Develop a strategy to scale up improvement in administrative data in the middle to long term. Although this activity will focus on selected programs and/or public services, an expansion to other public interventions may be done by the client through the development of specific guidelines and didactic material, and trained civil servants.

Upon completion of the activity, the project is expected to help improve the capacity of CBS to better coordinate administrative data among MDAs.

Component 4: Project Management

Importance of project management in attaining full project implementation. Careful project management is crucial to attain full project implementation. The success of the project depends on bringing together and coordinating of stakeholders comprising users and producers of official statistics. This component will include funds and activities related to project management. For example, the project will strengthen CBS fiduciary functions (procurement and financial management) and project management capabilities. The project will finance training of CBS project core team including the procurement officer, financial management officer. These officers will ensure compliance with procurement, disbursement, and financial management policies and procedures as well as agreed reporting requirements. This component will also finance operational costs related to project implementation (including the use of local consultants as necessary).

Project Financing

The project will be financed with a grant of US\$ 500,000 under the umbrella of Trust Fund for Statistical Capacity Building, TFSCB. The Grant Funding Request (GFR) is being submitted together with the AIS/IN for approval for a period of two years. The Government has strongly committed to support the activities that will be financed by the grant.

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The project costs by component are as follows:

Project Components	Total cost (USD)
Component 1: Improving the quality of household poverty survey data	210,000
Component 2: Improving capacity for data analysis, report writing and dissemination	130,000
Component 3: Improving statistical coordination and availability of administrative data in education and heath sectors	114,000
Component 4: Project Management	46,000
Total Project Costs	500,000

SAFEGUARDS

E. Safeguard Policies that Might Apply

Safeguard Policies Triggered by the Project	Yes	No	TBD
Environmental Assessment OP/BP 4.01		X	
Natural Habitats OP/BP 4.04		X	
Forests OP/BP 4.36		X	
Pest Management OP 4.09		X	
Physical Cultural Resources OP/BP 4.11		X	
Indigenous Peoples OP/BP 4.10		X	
Involuntary Resettlement OP/BP 4.12		X	
Safety of Dams OP/BP 4.37		X	
Projects on International Waterways OP/BP 7.50		X	
Projects in Disputed Areas OP/BP 7.60		X	

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