

INTEGRATED SAFEGUARDS DATA SHEET CONCEPT STAGE

Report No.: ISDSC15745

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I. BASIC INFORMATION

A. Basic Project Data

Country:	Haiti	Project ID:	P155191
Project Name:	Providing an Education of Quality in Haiti (PEQH) (P155191)		
Task Team Leader(s):	Juan Baron, Melissa Ann Adelman		
Estimated Appraisal Date:	30-Mar-2016	Estimated Board Date:	29-Jun-2016
Managing Unit:	GED04	Lending Instrument:	Investment Project Financing
Sector(s):	General education sector (10%), Primary education (90%)		
Theme(s):	Education for all (90%), Managing for development results (10%)		
Financing (In USD Million)			
Total Project Cost:	30.00	Total Bank Financing:	30.00
Financing Gap:	0.00		
Financing Source			Amount
BORROWER/RECIPIENT			0.00
International Development Association (IDA)			30.00
Total			30.00
Environmental Category:	B - Partial Assessment		
Is this a Repeater project?	No		

B. Project Objectives

The objectives of the Project are to: (i) improve learning conditions in selected public and non-public primary schools, (ii) maintain enrollment of students in selected public and non-public primary schools; and (iii) strengthen public management of the education sector.

C. Project Description

Through its current Project, the Bank supports several initiatives addressing primary education access and quality, providing a broad base for the proposed Project to build on. Under the Education

For All Phase II (EFA II) Project, the Bank is investing USD \$109 Million (2012-2017) primarily in non-public school tuition waivers (EPT), rural public school construction, school health and nutrition, teacher training, and capacity building in MENFP. Activities are spread across over 1,400 schools in eight departments, and few schools receive more than one intervention (e.g. the tuition waiver program and the school health and nutrition program are provided to different schools).

Several important lessons have been learned from EFA II and will be integrated into the proposed Project. For example, schools participating in the tuition waiver program have larger student bodies and lower rates of late entry and grade repetition compared to schools that applied but were not selected, indicating the high demand for free education and the effectiveness of conditioning financing on specific rules. However, periodic verification exercises have found that the program has been less successful in enforcing minimum inputs for learning, such as the provision of textbooks to students, due to a lack of consequences for noncompliance. Also, interventions to improve learning conditions, such as teacher training and school feeding, have been dispersed across schools, reducing their impact on education quality. Under the proposed Project, interventions would be coordinated in a smaller number of schools, and for non-public schools, financing would be conditioned on achieving specific results. Financing would also be provided for all students in the school, and not for individual grade cohorts, to allow schools to receive a critical mass of funding to be able to improve the quality of education provided.

In addition, two major commitments remain from EFA II that will be assumed under the proposed Project. While the tuition waiver program is phasing out (as described above), financing for the sixth grade year of the program's final cohort is not available under EFA II. Regarding public school construction, the Project is currently financing the functioning of schools in 61 rural communities in the Grand Sud (the departments of Sud, Sud Est, Grand Anse, and Nippes), the majority of which are operating under temporary shelter until their school buildings are constructed. While construction will continue until Project closing, approximately 30 communities will remain without physical school buildings. In addition, MENFP has not taken the expected steps to assume the recurrent costs of any of the schools. Active policy dialogue on sector financing will address this issue as well, but in the interim both the final tuition waiver cohort and ensuring access to schools in the 61 rural communities are important commitments to be assumed under the proposed Project.

Project concept: Diminished resources, continued policy uncertainty, and institutional weakness call for a focused and strategic approach that supports access to quality primary education, while strengthening MENFP's capacity to manage the education system. The activities under the Project are those critical to improving the quality of education, inter alia: assessment and data collection; provision of critical inputs corresponding to needs identified through assessment, including basic infrastructure, teacher and school director training, and school feeding; as well as technical capacity building to increase efficient, effective functioning of MENFP. Through the planned activities, the Project aims to focus interventions in order to produce results in terms of quality primary education, establish systems to track progress, incentivize evidence-based decision-making, and strengthen the capacity of MENFP to manage the system. To do this, the Project would incorporate: (i) the lessons learned from the Education For All Phase I (2007-2012) and Phase II (2012-2017) Projects and (ii) the new realities and priorities of the GOH five years after the earthquake. The Project would align with MENFP's forthcoming Operational Plan 2016-2020, and exploit opportunities to leverage other development partners' available financing and to maximize synergies with partners' activities.

Component 1: Expanding Access to Quality, Public Primary Education in Underserved, Poor Communities. (US \$17.5 Million) This component would provide access to primary education in 61

poor, rural communities in the Grand Sud where schools are not available (as identified under the EFA Phase II Project) through a school network model tailored to the situation of each community. , Specifically, in communities located within a reasonable distance of an existing public school, transportation for children to access the school would be financed, and the existing public school would be supported in upgrading its learning environment through a school improvement plan. For those communities without access to an existing public school, “satellite” classrooms would be built for early primary children unable to travel substantial distances.

Activities to be financed under this component would therefore include, inter alia: transportation; classroom construction in a small number of communities (all meeting basic infrastructure and other standards as defined in the quality assurance system); initial operating costs of all classrooms constructed; school director training in leadership and management, including support in formulating and implementing school improvement plans based on the quality assurance system assessment; teacher training to improve pedagogical skills and content knowledge; costs of school improvement plan implementation (including minor works); school feeding; and community engagement activities.

Sustainable and effective data collection and communication approaches, exploiting ICT as appropriate, would be utilized to support all activities. A crucial aspect of this component would be the use of the quality assurance system to identify needs and track progress.

Component 2: Supporting Access to Quality, Non-Public Primary Education in Poor Communities. (US \$7.5 Million) This component would consist of two sub-components:

(1) Support to the final tuition waiver program cohort (US \$2.5 Million), which would finance the sixth grade for approximately 28,000 students currently supported under EFA II.

(2) Support to MENFP's results-based financing mechanism of non-public schools (US \$5 Million), which would include, inter alia: (i) assessing the learning conditions and learning outcomes of participating schools using the quality assurance system, (ii) training school directors in effective management and leadership, (iii) training teachers to improve pedagogical skills and content knowledge, and (iv) funding per-student subsidies conditional on meeting well-defined standards on learning conditions and learning outcomes. All students in approximately 20 primary schools (grades 1 through 6) would be supported, and all would be located in the Grand Sud in order to leverage support provided to building MENFP's local capacity under Component 3. All schools would be required to meet quality assurance standards in order to continue to receive financing, and a list of eligible schools would be maintained to facilitate the rapid incorporation of new schools to the program.

Component 3: Providing Technical Assistance, Institutional Strengthening to MENFP, and Project Management. (US \$5 Million) This component would consist of two sub-components:

(1) Technical Assistance (US \$4 Million) to provide strategic support to MENFP in improving its functioning through, inter alia: (i) support to the directorates of the four geographic departments in which component 1 and 2 activities are located, the technical directorates charged with regulating the primary sector, and the technical directorates charged with data collection and learning assessments in building and using sustainable monitoring mechanisms including quality assurance tools and in incorporating evidence into policymaking; and (ii) financing sustained technical assistance and capacity building through a placement program for internationally trained individuals of Haitian origin to work within MENFP. This component would also provide financing for technical assistance

for the achievement of DLIs, as well as Project Monitoring and Evaluation and the associated costs of implementing the Project.

(2) Disbursement-Linked Indicator (DLI) based Strengthening Public Management (US \$1 Million). This sub-component would disburse based on the achievement of three indicators related to tangible improvements in MENFP's functioning. While specific indicators are to be determined, MENFP has agreed in principle that these indicators should be related to the Ministry's capacity to collect and utilize data in its management of the sector. The choice of a DLI approach is justified as a strategy to focus the attention and the efforts of the MENFP on the results, and less on the leverage than the value of the DLI would have.

Cross-cutting areas:

Social: A social assessment was carried out during the preparation of the Education for All (APG 1). Among the findings were: i) elite capture by school directors, ii) conflict created by the infusion of money into schools/school management committees, iii) teachers abandoning rural areas, and iv) inequality being exacerbated between beneficiaries and non-beneficiaries. The Project addresses these through instilling a series of checks and balances at the local level, involving community participants in the management of Project resources, ensuring that Project resources intended to be managed by communities would effectively be managed by them, providing employment opportunities in rural areas for trained teachers, and having a highly targeted Project design, such that the Project benefits are enjoyed by those populations traditionally underserved by public services. The social assessment prepared in the previous project continues to be relevant for the Project at hand and thus will not be updated.

Gender: In terms of primary school participation, girls and boys enroll at roughly equal rates. However, boys are more likely to be overage, while girls start to drop out of school earlier than boys, around the age of 14, potentially related to social factors such as early marriage. Recent data suggests that in Haiti, 17 percent of girls are married by age 18. In addition, gender-based violence and women's disadvantage in the labor market are important realities in the Haitian context. Interventions designed under the proposed Project would be informed by this context, for example incorporating gender considerations into the design of sanitation infrastructure, teacher training, and community engagement activities. The Project would also track gender-disaggregated data on numbers of beneficiaries and on student learning outcomes.

Citizen engagement: The proposed Project would engage beneficiaries in several ways. The quality assurance system that will be used under Components 1 and 2 will include a parent and student survey, and so measures of school learning conditions will incorporate parent and student feedback. The rural communities targeted under Component 1 have already been mobilized under EFA II and are actively involved in the oversight of the operation of their temporary schools and the construction of the permanent structures. For both Components 1 and 2, a focus on data and leveraging ICT will create direct chains of communication between parents and MENFP, as well as school officials and MENFP. For example, schools participating in the results-based financing will be required to provide cell phone numbers for a subset of parents, so that they can be directly contacted for feedback. Furthermore, the safeguards official within the PIU will be in charge of visiting project sites regularly to document grievances raised by the population and address them properly. Indicators to measure these aspects will be developed for the Results Framework.

Coordination with development partners: The Bank continues an active dialogue with major

development partners (e.g. IDB, European Union, UNESCO, Donor Group on education) in order to align interventions and pursue potential opportunities for additional financing for the proposed Project. Given the potential for such additional financing, the proposed Project would be structured such that new resources would go towards scaling up well-functioning activities, inter alia: adding new rural communities in need of public school construction, adding non-public schools to the results-based financing mechanism, or adding results to the DLI sub-component.

Research agenda: In partnership with MENFP, the Bank will develop a research agenda and seek financing opportunities to carry out under the proposed Project. For example, an impact evaluation of the results-based financing mechanism would exploit the random selection of schools into the program and the potential for gradual phase-in of additional schools if new financing becomes available.

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

While the sites for school construction were identified, donated voluntarily, and transferred to the Directorate of School Engineering (Direction du Genie Scolaire) (DGS) in the previous project, the current Project will reassess the need for each community-managed school and its corresponding site. Not all sites identified in the previous project will be used. The Project will return some of the sites to the communities and take alternative measures to improve access to education.

Since the exact location of schools would not be known before Project implementation, as per OP/BP 4.01 (Environmental Assessment), an ESMF and RPF are required to outline how sites would be selected, and how potential adverse environmental and social impacts at these sites would be identified, minimized, mitigated, and managed. This ESMF and RPF have been prepared by the DGS based on a previous framework prepared by the Economic and Social Assistance Fund (Fonds d'Assistance Économique et Sociale) (FAES) and MENFP. Potential adverse impacts would be small-scale in time and space related to construction/rehabilitation impacts. The ESMF focuses on how to address construction-type impacts (what kind of training and protective gear workers would receive; how waste, noise, and dust would be managed, etc.). Any identified sites requiring acquisition of private land, involuntary resettlement, loss of economic livelihoods or that affect critical natural habitats, forests or physical cultural resources would be screened out by MENFP's local offices during the approval process of community Projects. The ESMF and RPF will also include a budget for safeguard actions and a snapshot of the institutional arrangements for screening sites, developing mitigation actions, implementing these actions and supervising adherence to them. The ESMPs (Environmental and Social Management Plans) and RAPs (Resettlement Action Plans) will be developed when the sites are identified prior to the beginning of the construction works, and DGS would supervise the implementation of these instruments at each site through regular field visits and providing a hotline to the project beneficiaries to obtain feedback.

E. Borrowers Institutional Capacity for Safeguard Policies

While the Education for All Project did not originally contemplate causing involuntary resettlement and relied on a screening process for voluntary land donation, the displacement of 6 families due to the construction of a school triggered OP/BP 4.12. As a result, the borrowers' capacity to prevent involuntary resettlement was put into question. The Project hired a firm to screen community-managed schools for a range of aspects including potential involuntary resettlement. The client is currently in the process of hiring a consultant to analyze the situation in any plots of land that were red-flagged by the firm and draft any necessary RAPs. The Project will take active steps to enhance the safeguards capacity of the client. Unlike the Education for All Project, which did not count with a

dedicated safeguards position, the Project at hand will hire a full time staff member in charge of safeguards.

F. Environmental and Social Safeguards Specialists on the Team

Asli Gurkan (GSURR)

Felipe Jacome (GSU04)

II. SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	The OP/BP 4.01 will be triggered due to the project activities that will include the rehabilitation and/or construction of primary schools. These works may have adverse impacts, although they are expected to be small-scale with easily identifiable mitigation measures. Furthermore, the sites that have been proposed by local communities will be evaluated on the basis of the updated ESMF and their proximity to an existing public school. The public schools to be rehabilitated will also be identified and screened using the updated ESMF. Therefore, the project is classified as category B. The existing Environmental and Social Management Framework (ESMF) remains the relevant safeguards instrument but needs to be updated, with guidelines and procedures for assessing and monitoring the social and environmental risks and impacts (both positive and negative) throughout the project, including guidelines for the preparation of Environmental and Social Impact Statements (ESISs). This will also include the environmental and social management plans (ESMPs) and their implementation for school construction/ rehabilitation. The updated ESMF will be consulted upon and re-disclosed both in country and at the World Bank's website prior to appraisal. The updated ESMF will clearly reflect the issues of the construction-type impacts and building safety, disability access, that no asbestos-containing materials should be used in the construction, and safe removal of any existing materials. A standard Environmental and Social Management Plan (ESMP) will be used in simple situations (especially for some school rehabilitations) where activities need no additional assessment. Any exceptions will be identified during the screening phase (as detailed in the ESMF) and additional assessment work will be done during project implementation, if required.
Natural Habitats OP/BP 4.04	No	The proposed project is not meant to affect any type

		of habitat naturally inhabited by biological creature that could be disturbed. However, the ESMF will include screening procedures to ensure that adverse impacts on natural habitats are avoided.
Forests OP/BP 4.36	No	The proposed project is not meant to affect forests, nor will it involve reforestation. However, the ESMF will include screening procedures to ensure that adverse impacts on forests and forest resources are avoided.
Pest Management OP 4.09	No	This policy is not triggered. Specific activities under the project which may involve the incidental use of pesticides or herbicides include termite building treatments, vector control and/or emergency response activities. Nevertheless, the incidental use of pest control measures will be managed by detailing appropriate procedures in the generic standardized EMP for inclusion into contracts.
Physical Cultural Resources OP/BP 4.11	No	The proposed operations are not expected to pose risks of damaging cultural properties. Nevertheless, some of the construction works may result in the destruction of artifacts of cultural significance. The updated ESMF will include a chapter relating to Chance-find procedures as well as historic building screening procedures, describing the assistance for preservation of historic or archeological sites; and no separate no separate safeguards instrument will be prepared.
Indigenous Peoples OP/BP 4.10	No	The activities of the proposed project are not anticipated to trigger this safeguard policy since there are no indigenous people in Haiti.
Involuntary Resettlement OP/ BP 4.12	Yes	<p>OP 4.12 has been triggered to allow municipalities to identify resettlement needs that could be required and to ensure that the affected people would be provided with the required assistance and livelihood support under the policy</p> <p>While all communities have earlier identified potential land plots of land for school construction as part of the ongoing education project, and voluntarily and formally transferred them to the Government, it was agreed as part of this new project's design that there will not be construction on most of those plots.</p> <p>It is currently not known on which sites the schools will be built/rehabilitated. Instead, the project will identify public schools that children in the</p>

		<p>communities can access, and finance transportation for them, as well as improvements at the existing schools. Only in cases where there is no option to access an existing school, the project will consider new construction. The Project will return some of the already identified sites to the communities and take alternative measures to improve access to education (i.e. increase number of classrooms of existing school, or facilitate access to existing schools). The project is currently in the process of hiring a consultant to make this assessment and selection in the next several months.</p> <p>As the exact nature and location of the works remains unknown, a “Framework” approach will be adopted. A Resettlement Policy Framework (RPF) of the last project will be updated, consulted on and disclosed before appraisal. If it is determined that any of the sites where sub-projects are yet to be developed require the involuntary taking of land, the Project will prepare a site-specific Resettlement Action Plans (RAP), which needs to be implemented by the client prior to the start of any construction. The affected people must have received their compensation or relocated under conditions equal to or better than their conditions before the investments.</p>
Safety of Dams OP/BP 4.37	No	This policy is not triggered, as there will be no dam construction or rehabilitation of dams that will necessitate safety status reports.
Projects on International Waterways OP/BP 7.50	No	This policy is not triggered, for the project sites will not affect international waterways.
Projects in Disputed Areas OP/BP 7.60	No	This policy is not triggered because project intervention sites will not be within disputed areas.

III. SAFEGUARD PREPARATION PLAN

A. Tentative target date for preparing the PAD Stage ISDS: 25-Jan-2016

B. Time frame for launching and completing the safeguard-related studies that may be needed.

The specific studies and their timing¹ should be specified in the PAD-stage ISDS:

25 January 2016

IV. APPROVALS

Task Team Leader(s):	Name: Juan Baron, Melissa Ann Adelman	
<i>Approved By:</i>		
Safeguards Advisor:	Name: Francis V. Fragano (SA)	Date: 10-Dec-2015

¹ Reminder: The Bank's Disclosure Policy requires that safeguard-related documents be disclosed before appraisal (i) at the InfoShop and (ii) in country, at publicly accessible locations and in a form and language that are accessible to potentially affected persons.

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Practice Manager/ Manager:	Name: Yves Jantzem (PMGR)	Date: 10-Dec-2015
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