



RESTRUCTURING PAPER
ON A
PROPOSED PROJECT RESTRUCTURING
OF A
JUSTICE SECTOR INSTITUTIONAL STRENGTHENING PROJECT
APPROVED ON MARCH 19, 2014
TO
REPUBLIC OF KAZAKHSTAN

GOVERNANCE

EUROPE AND CENTRAL ASIA

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ABBREVIATIONS AND ACRONYMS

GOK	Government of Kazakhstan
GPO	General Prosecutor's Office
IBRD	International Bank for Reconstruction and Development
ISG	Implementation Support Group
JSISP	Justice Sector Institutional Strengthening Project
JV	Joint Venture
MIA	Ministry of Internal Affairs
MOF	Ministry of Finance
MOJ	Ministry of Justice
MTR	Mid-Term Review
PAD	Project Appraisal Document
PDO	Project Development Objective
PIU	Project Implementation Unit
POM	Project Operations Manual
RP	Restructuring Paper
QCBS	Quality and Cost Based Selection
SC	Supreme Court



BASIC DATA

Product Information

Project ID P143274	Financing Instrument Investment Project Financing
Original EA Category Not Required (C)	Current EA Category Not Required (C)
Approval Date 19-Mar-2014	Current Closing Date 31-Dec-2018

Organizations

Borrower Republic of Kazakhstan	Responsible Agency Ministry of Justice
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Project Development Objective (PDO)

Original PDO

The objectives of the Project are: (a) to strengthen the institutional capacity of Selected Agencies for effective implementation of selected laws, and (b) to improve the efficiency and transparency of, and access to, selected public services in the justice sector.

Summary Status of Financing

Ln/Cr/Tf	Approval	Signing	Effectiveness	Closing	Net Commitment	Disbursed	Undisbursed
IBRD-83610	19-Mar-2014	29-Apr-2014	22-Oct-2014	31-Dec-2018	36.00	3.95	32.05

Policy Waiver(s)

Does this restructuring trigger the need for any policy waiver(s)?

No



I. PROJECT STATUS AND RATIONALE FOR RESTRUCTURING

Introduction: Although the project has faced several delays since effectiveness, recent developments suggest a much greater potential to achieve impact in many areas of the project, although on a smaller scale than originally envisioned. The project is therefore being restructured by reflecting the revised policy priorities, updating the results indicators and adjusting the financing requirements for the achievement of project objectives.

This is a technical assistance project designed to strengthen justice sector institutions and covering beneficiary agencies across the judicial and executive branches of the government. The approved project cost was initially US\$60 million (comprising a US\$36 million IBRD loan and a US\$24 million government contribution). The project became effective on October 22, 2014. As of April 16, 2018, an amount of US\$3.9 million (11 percent of the loan amount) has been disbursed. US\$5.5 million is forecasted to be disbursed by June 30, 2018. The closing date is December 31, 2018.

Despite rapid preparation, approval, ratification and subsequent effectiveness, implementation of project activities was slow to begin. Following changes within the Government in 2015, the Project Director, who at the time occupied the functions of the Executive Secretary at the Ministry of Justice (MOJ), was appointed Deputy Head of the Administration of the President. As a result, Project implementation was paused for several months until a new Executive Secretary was appointed and the project could proceed. Subsequently in 2016, the former Executive Secretary then Deputy Head of Administration of the President became the Minister of Justice of Kazakhstan. This change in positions accelerated the project implementation pace as the Minister is now personally overseeing the Project.

The project design was reliant on the selection of an Implementation Support Group (ISG) that was responsible for assisting implementing agencies with both technical and fiduciary aspects of project implementation. The first ISG contractor was terminated by the MOJ in 2015 due to poor performance, delayed staff deployment and failure to initiate procurement. Subsequently, a new ISG contractor was selected in May 2016 and began work in November 2016.

Since work began in late 2016, the Project has demonstrated gradual progress in implementation leading to some promising results. Said results include the following:

- Pilot courts in Astana were effectively strengthened with the engagement of advisors and judge assistants, resulting in increased efficiency of service delivery and case administration, and reduced case backlogs.
- ICT Strategies for the MOJ and the Supreme Court, the Strategy for the Academy of Justice were developed and are currently at an advanced approval stage.
- The capacities of the Supreme Court staff with regards to court administration and e-justice were strengthened through a series of knowledge-sharing events and technical visits.
- The Project also provided support to the creation of an autonomous body, namely the Supreme Judicial Council, that is responsible for selecting judges.
- Professional skills and capacities of forensic experts have been enhanced. Recommendations to improve the legal and institutional framework for forensic services were also provided.
- The Project supported the advancement of the recent constitutional and law enforcement reforms by providing just-in time expertise to commentaries on the constitutional laws, the introduction of elements of the adversarial system and the guarantee of constitutional rights of citizens during criminal proceedings.

Overall, the practical results achieved so far have served to strengthen Kazakhstan's justice sector institutions by equipping judicial staff with necessary skills and tools to deliver justice services to citizens and business in both criminal and civil



proceedings, and by reforming the institutional and legal landscape to provide a solid foundation for the attainment of development goals.

In addition to implementation advancement, the last six months have also shown consistent progress on procurement. New contracts have been entered into for consultancy services including the improvement of property registration, state-guaranteed legal aid and intellectual property. As of 30 March 2018, the value of signed contracts amounts to US\$17.7 million, as compared with US\$11.8 million as of January 2017. Specifically, four new contracts for a total value of US\$5.9 million have been signed over the last few months: QCBS-03 "Improvement of property registration and valuation services and state-guaranteed legal aid", QCBS-05 "Improving Standards in the Field of Intellectual Property", QCBS-04 "Improvement of the Legislation of the Republic of Kazakhstan, and the Knowledge Base of the Effective Legislation of the Republic of Kazakhstan", "Logistics Services" framework agreement.

Further, four additional contracts are currently under procurement for a total value of US\$1.7 million: "Improving the Enforcement of Judicial Decision", "Improvement of court monitoring, analytics procedures and system of uniform judicial practice development", "Evaluation of Professional Activities of the Judiciary", "Analysis and recommendations to improve energy efficiency and access for handicapped persons to court buildings.

Timely implementation of these contracts by December 2018 is expected to enable the Project to generate valuable results by the Project closing date. The latest PDO and IP ratings stand at MU and will be revisited in the next ISR once the restructuring is processed and the progress on the revised results indicators and signed contracts is captured.

Recent developments suggest a much greater potential to achieve impact in many areas of the project, although on a smaller scale than originally envisioned. Component A activities related to the drafting and implementation of the Commercial Code, the Law on Self-Regulatory Organizations, and the Penal Code - all of which are part of the "100 Steps" program's legislative package developed by the Government and approved by the Parliament in 2015 - will be scaled down. Elements of the new legislation, however, require amendments in order to align it with international good practices and simplify implementation. As a result, the Project will support consultations with stakeholders and the drafting of the amendments to the Commercial Code and the Law on Self-Regulatory Organizations in the framework of the QCBS-04 contract of March 2018. Furthermore, component C will also be scaled down consistent with the new Judicial Modernization Concept 2018-2020, which is structured around seven pillars for strengthened public trust, efficiency and transparency. Since part of the originally planned activities (e.g. courts monitoring dashboard) have been implemented by the Supreme Court using its own resources, the IT related activities are also being scaled down.

The proposed reduction in the scale of Components A and C will not require amendments to Schedule 1 of the Loan Agreement as they do not imply changes to the PDO and the description of the Project, given that many of the originally planned activities have been implemented by the Borrower using its own funds.

In that context, the authorities have asked the Bank to restructure the JSISP so as to adequately respond to their new policy initiatives and expedite project implementation with a realistic envelope of resources. The project is therefore being restructured to reflect the authorities' intention, and to: (i) reduce the project cost while keeping the PDO and the description of the Project unchanged; (ii) modify the project results indicators; (iii) reduce the government contribution from US\$24 million to about US\$18 million; and (iv) cancel US\$9 million from the uncommitted IBRD loan proceeds which will not be utilized due to delays and institutional requirements. This restructuring proposal is based on this approach and rationale so as to improve project implementation and achievement of results.

No changes have been proposed to institutional, disbursement or financial management arrangements, which continue to be adequate. There are no overdue audits under the project.



The MOJ and the Supreme Court informally requested the Bank team to consider the extension of the closing date by two years to enable the full implementation of the signed contracts and support the new judicial reform strategy that is being developed by the new President of the Supreme Court. The Bank team informed the MOJ that the major task at hand is to complete the current restructuring, demonstrate renewed implementation progress, and receive the new judicial reform strategy that is under development by the new President of the Supreme Court before extension in time could be considered. For this reason, and given that the formal request from the MOF only calls for reduction in the loan amount and updating of results indicators, the current restructuring paper does not propose a change in the loan closing date.

Based on this restructuring, which adjusts down the resource envelope by cancelling US\$9 million of the loan, prioritizes the project tasks as per new policy priorities and updates the results indicators, it is expected that the justice authorities will achieve a much higher pace of implementation and disbursements in the coming months. As a follow up, subject to the achievement of these milestones, it is expected that the authorities will request the Bank for another restructuring to extend the closing date and further expand project results. The purpose would be to seek additional time to implement the new judicial concept which is being developed by the Supreme Court, and to replicate pilot programs such as in forensic services, and court management to additional locations after the ongoing pilot activities are completed and impacts assessed.

II. DESCRIPTION OF PROPOSED CHANGES

UPDATING OF RESULTS INDICATORS

The proposed modifications of the results indicators reflect the reduction in the scale and cost of project financed activities, consistent with the revised policy priorities. Thus, indicators related to the implementation of the new Commercial (Entrepreneurship) Code, the new Law on Self-Regulatory Organization's and the Administrative Offences Code and the coverage of free legal aid have been eliminated because the project will be shifting its focus more to the improvement of these legal acts based on focus group discussions funded by the Project. The relevant indicators are added. PDO indicator on access to information is moved to intermediate indicator. New indicators on public participation in lawmaking, strengthening intellectual property rights, and improving forensic services were added to capture the shift in policy priorities.

The proposed revisions to the indicators are specified in Part IV (Detailed Changes, Results Framework) of this restructuring paper (RP). Upon approval of the RP, the Supplemental Letter no. 2 will be amended accordingly. The draft of the Supplemental Letter no. 2 is attached.

PARTIAL CANCELLATION: DEMONSTRATION OF PROACTIVITY AND FOR REVISED SCOPE

An amount of US\$9 million is proposed to be cancelled from uncommitted IBRD loan proceeds, leaving the loan amount of US\$27 million, including US\$23.1 million undisbursed. The government contribution will be reduced by US\$6 million, leaving US\$18 million as the government contribution. The total project cost will thus come down from US\$60 million to US\$45 million. The partial cancellation will demonstrate the willingness of the authorities to take proactive action in responding to implementation challenges and requirements. It will also help the authorities focus on current priorities (signed contracts) and advance their implementation without further delays. The procurement effort is currently on schedule to meet work plan requirements. The ISG has also streamlined its procurement support work to enable expeditious advancement of implementation and minimization of procurement delay risks. The recently updated Project Operations Manual lays out clear project implementation steps and internal approval procedures, which is expected to accelerate decision-making and the procurement process.



CHANGE IN THE COSTS OF COMPONENTS

The table below shows the proposed reallocation between project components, as reflected in the updated Procurement Plan agreed on between the Bank and the Borrower:

Component	Allocation in the PAD (\$ million)	Proposed allocations (\$ million)
A. Legal and Institutional Framework	6.72	2.32
B. MoJ Service Quality and Responsiveness	7.08	10.46
C. Judicial Efficiency and Professionalism	16.60	7.75
D. Project Implementation, Coordination and Fellowships	3.07	3.47
Contingency	2.51	3.00
Total IBRD	35.98	27.00

Some activities under Component A such as those related to the drafting of legislation are no longer required as these have been completed using other resources. Component B will support further improvements to intellectual property rights protection, property registration, and forensic capacity strengthening. Component C includes new activities to strengthen the performance monitoring of courts, ensure consistency in judicial practices, conduct a training needs assessment of Kazakhstan’s Judicial Academy (which was transferred from the executive branch to the Supreme Court) and support the development of the Judicial Modernization Concept 2018-2020 announced in January 2018 by the new President of the Supreme Court. Allocations for the Component D are increased to reflect the actual contract amount of the Implementation Support Group and the costs of planned knowledge sharing and training activities.

Allocation of the amounts of the Loan to each Category, and the percentage of expenditures to be financed for Eligible Expenditures in each Category will be changed as follows:

Category	Amount of the Loan Allocated (expressed in USD)	Percentage of Expenditures to be financed
(1) Consultants’ services, Training, goods and Incremental Operating Costs for the Project (Excluding Fellowships Grants under Part D.2 of the Project)	26,577,000	60%
(2) Fellowships Grants under Part D.2 of the Project	423,000	60%
Cancelled as of March 5, 2018	9,000,000	
TOTAL AMOUNT	36,000,000	

PROPOSED CHANGES TO RISK RATINGS

The Systematic Operations Risk-Rating Tool (SORT) currently used to assess project risk ratings was not in use in the World Bank at the time of project preparation. The team has used SORT to assess project risk at restructuring in Section IV (Detailed Changes). Political and governance risk is rated High because of Kazakhstan’s record of frequent changes and



reshuffles at senior levels of government. Macroeconomic risk is rated Substantial due to the ongoing low oil prices, reduced government revenues and budget constraints. The risk for sector strategies and policies is rated High due to frequent changes in policies, laws and regulations, which create an uncertain sector operating environment. The risk for institutional capacity for implementation and coordination is rated High due to Kazakhstan’s track record of slow project implementation, complex internal processes, numerous signatures required for approvals and the challenge the MOJ faces in coordinating implementation across numerous beneficiary agencies including the judiciary. In addition, the MOJ’s Implementation Support Group (ISG) will also need to increase its procurement capacity to process procurements within the timelines indicated in the agreed Procurement Plan. Fiduciary risk is rated Substantial because of the risk of delays in procurement processes, bid evaluations, contract award and contract administration in addition to the risk of collusive bids and the tendency of some agencies to attempt to commit or incur expenditures without following procedures. In view of the above, the overall project risk is rated High.

PROPOSED CHANGES TO PROCUREMENT ARRANGEMENTS

Following advice from the World Bank’s Europe and Central Asia Procurement team, prior review thresholds for contracts have been increased in line with the Bank’s modernized procurement framework. These changes are reflected in the updated project Procurement Plan.

III. SUMMARY OF CHANGES

	Changed	Not Changed
Change in Results Framework	✓	
Change in Components and Cost	✓	
Cancellations Proposed	✓	
Reallocation between Disbursement Categories	✓	
Change in Disbursements Arrangements	✓	
Change in Disbursement Estimates	✓	
Change in Overall Risk Rating	✓	
Change in Implementing Agency		✓
Change in DDO Status		✓
Change in Project's Development Objectives		✓
Change in Loan Closing Date(s)		✓
Change in Safeguard Policies Triggered		✓
Change of EA category		✓
Change in Legal Covenants		✓
Change in Institutional Arrangements		✓
Change in Financial Management		✓



Change in Procurement		✓
Change in Implementation Schedule		✓
Other Change(s)		✓
Change in Economic and Financial Analysis		✓
Change in Technical Analysis		✓
Change in Social Analysis		✓
Change in Environmental Analysis		✓

IV. DETAILED CHANGE(S)

RESULTS FRAMEWORK

Project Development Objective Indicators

<p>Percent of private sector respondents satisfied with implementation of the new Commercial Code, the new Law on Self-Regulatory Professional Organizations and the Administrative Offences Code Unit of Measure: Percentage Indicator Type: Custom</p>				
	Baseline	Actual (Current)	End Target	Action
Value	0.00	0.00	70.00	Marked for Deletion
Date	31-Dec-2013	28-Jun-2017	31-Dec-2018	
<p>Percent of users of JSISP-supported pilot courts expressing they are 'fully' or 'somewhat' satisfied with the quality of judicial services Unit of Measure: Percentage Indicator Type: Custom</p>				
	Baseline	Actual (Current)	End Target	Action
Value	27.00	0.00	55.00	No Change
Date	31-Dec-2013	28-Jun-2017	31-Dec-2018	
<p>Percent of civil enforcement execution documents received annually that are enforced by December 31 each year (by value) Unit of Measure: Percentage Indicator Type: Custom</p>				
	Baseline	Actual (Current)	End Target	Action
Value	5.00	5.22	10.00	Marked for Deletion



Date	31-Dec-2013	31-Dec-2017	31-Dec-2018	
Percent increase, over 2013 baseline, of aggregate case disposal ratio of civil cases for project-financed pilot courts Unit of Measure: Percentage Indicator Type: Custom				
	Baseline	Actual (Current)	End Target	Action
Value	0.00	0.00	50.00	Marked for Deletion
Date	31-Dec-2013	28-Jun-2017	31-Dec-2018	
Publication on the respective websites of the Ministry of Justice, the Supreme Court and project-supported pilot courts of data on judgments enforced, registrations processed, inspections and clearanc Unit of Measure: Yes/No Indicator Type: Custom				
	Baseline	Actual (Current)	End Target	Action
Value	No	No	Yes	Marked for Deletion
Date	31-Dec-2013	28-Jun-2017	31-Dec-2018	
Growth in number of eligible persons provided with free legal aid Unit of Measure: Percentage Indicator Type: Custom				
	Baseline	Actual (Current)	End Target	Action
Value	3.00	0.00	10.00	Marked for Deletion
Date	31-Dec-2013	28-Jun-2017	31-Dec-2018	
Growth in number of eligible women beneficiaries provided with free legal aid Unit of Measure: Percentage Indicator Type: Custom				
	Baseline	Actual (Current)	End Target	Action
Value	2.00	0.00	10.00	Marked for Deletion
Date	31-Dec-2013	28-Jun-2017	31-Dec-2018	
Publication on the Supreme Court website of main outcomes of regular monitoring of court performance and reports on implementation of SC recommendations Unit of Measure: Yes/No Indicator Type: Custom				
	Baseline	Actual (Current)	End Target	Action
Value	No	No	Yes	New



Date	31-Dec-2013	31-Dec-2017	31-Dec-2018	
Availability of new tools and mechanisms for public participation in lawmaking, enshrined in draft law and subordinate legal acts Unit of Measure: Yes/No Indicator Type: Custom				
	Baseline	Actual (Current)	End Target	Action
Value	No	No	Yes	New
Date	31-Dec-2014	31-Dec-2017	31-Dec-2018	
Availability of new tools that improve the awareness of eligible vulnerable groups on obtaining free legal aid Unit of Measure: Yes/No Indicator Type: Custom				
	Baseline	Actual (Current)	End Target	Action
Value	No	No	Yes	New
Date	31-Dec-2013	31-Dec-2017	31-Dec-2018	
Increased number of licensed forensic experts Unit of Measure: Number Indicator Type: Custom				
	Baseline	Actual (Current)	End Target	Action
Value	0.00	239.00	250.00	New
Date	31-Dec-2013	31-Dec-2017	31-Dec-2018	

Intermediate Indicators

Direct project beneficiaries Unit of Measure: Number Indicator Type: Custom				
	Baseline	Actual (Current)	End Target	Action
Value	0.00	915.00	3000.00	Revised
Date	31-Dec-2013	31-Dec-2017	31-Dec-2018	

Female beneficiaries Unit of Measure: Percentage Indicator Type: Custom Supplement				
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	Baseline	Actual (Current)	End Target	Action
Value	0.00	47.90	55.00	Revised

Amount of administrative fines annually collected, as a percentage of outstanding amount (as of December 31 each year)

Unit of Measure: Percentage

Indicator Type: Custom

	Baseline	Actual (Current)	End Target	Action
Value	25.00	55.00	60.00	Marked for Deletion
Date	31-Dec-2013	28-Jun-2017	31-Dec-2018	

Growth in number of finalized property registrations (annual)

Unit of Measure: Percentage

Indicator Type: Custom

	Baseline	Actual (Current)	End Target	Action
Value	0.00	0.00	50.00	Marked for Deletion
Date	31-Dec-2013	28-Jun-2017	31-Dec-2018	

Percent of judges and judicial staff trained under the Project, expressing they are 'satisfied' or 'fully satisfied' with training courses

Unit of Measure: Percentage

Indicator Type: Custom

	Baseline	Actual (Current)	End Target	Action
Value	0.00	0.00	75.00	Revised
Date	31-Dec-2013	28-Jun-2017	31-Dec-2018	

Percent of women judges and women judicial staff trained under the Project expressing they are 'satisfied' or 'fully satisfied' with training courses

Unit of Measure: Percentage

Indicator Type: Custom Breakdown

	Baseline	Actual (Current)	End Target	Action
Value	0.00	0.00	75.00	Revised
Date	31-Dec-2013	28-Jun-2017	31-Dec-2018	



Average number of days for disposal (from filing to final decision) of civil (including tax and family) cases in pilot courts supported by the project

Unit of Measure: Days

Indicator Type: Custom

	Baseline	Actual (Current)	End Target	Action
Value	420.00	420.00	350.00	Revised
Date	31-Dec-2013	28-Jun-2017	31-Dec-2018	

Cumulative number of former inmates and their family members provided employment through pilot employment program based on corporate social responsibility

Unit of Measure: Number

Indicator Type: Custom

	Baseline	Actual (Current)	End Target	Action
Value	0.00	0.00	1000.00	Marked for Deletion
Date	31-Dec-2013	28-Jun-2017	31-Dec-2018	

Cumulative number of former women inmates and women family members of former inmates provided employment through pilot employment program based on corporate social responsibility

Unit of Measure: Number

Indicator Type: Custom Breakdown

	Baseline	Actual (Current)	End Target	Action
Value	0.00	0.00	250.00	Marked for Deletion
Date	31-Dec-2013	28-Jun-2017	31-Dec-2018	

Publication on the respective websites (in situation center and similar display mechanisms) of the Ministry of Justice, the Supreme Court and pilot courts, supported by the projects, statistics on jud

Unit of Measure: Yes/No

Indicator Type: Custom

	Baseline	Actual (Current)	End Target	Action
Value	No	Yes	Yes	New
Date	31-Dec-2013	31-Dec-2017	31-Dec-2018	

Percentage of producers, copyright holders, and other entities, expressing they are 'fully' or 'somewhat' satisfied with the draft law, aimed at intellectual property rights and its protection

Unit of Measure: Percentage

Indicator Type: Custom



	Baseline	Actual (Current)	End Target	Action
Value	0.00	0.00	60.00	New
Date	31-Dec-2016	31-Dec-2017	31-Dec-2018	
New Concept of Judicial Modernization for 2018-2020 Unit of Measure: Yes/No Indicator Type: Custom				
	Baseline	Actual (Current)	End Target	Action
Value	No	No	Yes	New
Date	31-Dec-2014	31-Dec-2017	31-Dec-2018	

COMPONENTS

Current Component Name	Current Cost (US\$M)	Action	Proposed Component Name	Proposed Cost (US\$M)
A. Strengthening the Implementation of Key Elements of the Legal and Institutional Framework	6.72	Revised	A. Strengthening the Implementation of Key Elements of the Legal and Institutional Framework	2.32
B. Improving the Service Quality and Responsiveness of the Ministry of Justice	7.08	Revised	B. Improving the Service Quality and Responsiveness of the Ministry of Justice	10.46
C. Strengthening Judicial Efficiency and Professionalism	16.60	Revised	C. Strengthening Judicial Efficiency and Professionalism	7.75
D. Project Implementation and Coordination	3.07	Revised	D. Project Implementation and Coordination	3.47
Contingency	2.51	Revised	Contingency	3.00
TOTAL	35.98			27.00



CANCELLATIONS

Ln/Cr/Tf	Status	Currency	Current Amount	Cancellation Amount	Value Date of Cancellation	New Amount	Reason for Cancellation
IBRD-83610-001	Disbursing	USD	36,000,000.00	9,000,000.00	05-Mar-2018	27,000,000.00	BORROWER'S REQUEST FOR COUNTRY REASONS

REALLOCATION BETWEEN DISBURSEMENT CATEGORIES

	Current Allocation	Actuals + Committed	Proposed Allocation	Financing % (Type Total)	
				Current	Proposed
IBRD-83610-001 Currency: USD					
iLap Category Sequence No: 1		Current Expenditure Category: CS, TR, GO, IOC (excd Fellow. Gr.)			
	35,577,000.00	2,861,688.10	26,577,000.00	60.00	60.00
iLap Category Sequence No: 2		Current Expenditure Category: FELLOWSHIP GRANTS - Part D.2			
	423,000.00	0.00	423,000.00	60.00	60.00
Total	36,000,000.00	2,861,688.10	27,000,000.00		

DISBURSEMENT ESTIMATES

Change in Disbursement Estimates
Yes

Year	Current	Proposed
2014	0.00	0.00
2015	182,000.00	182,000.00
2016	150,000.00	150,000.00
2017	2,610,000.00	1,500,000.00



2018	9,500,000.00	3,600,000.00
2019	23,558,000.00	21,568,000.00
2020	0.00	0.00

SYSTEMATIC OPERATIONS RISK-RATING TOOL (SORT)

Risk Category	Rating at Approval	Current Rating
Political and Governance		● High
Macroeconomic		● Substantial
Sector Strategies and Policies		● High
Technical Design of Project or Program		● Substantial
Institutional Capacity for Implementation and Sustainability		● High
Fiduciary		● Substantial
Environment and Social		● Low
Stakeholders		● Substantial
Other		
Overall		● High