



# Validation Report

---

Reference Number: PVR-375  
Project Number: 35197  
Loan Number: 2197  
December 2014

## Sri Lanka: Technical Education Development Project

Independent Evaluation Department  
**Asian Development Bank**

## ABBREVIATIONS

ADB	–	Asian Development Bank
COTS	–	Colleges of Technology
EIRR	–	economic internal rate of return
EMIS	–	education management information system
MSDVTE	–	Ministry of Skills Development, Vocational and Technical Education
NVQ	–	national vocational qualification
PCR	–	project completion report
PSC	–	project steering committee
SDP	–	Skills Development Project
TEDP	–	Technical Education Development Project
TEVT	–	technical education and vocational training
Univotec	–	University of Vocational Technology

## NOTE

In this report, “\$” refers to US dollars.

### Key Words

adb, asian development bank, national vocational qualification, poverty reduction, project completion report, project validation report, sdp, sri lanka, technical education and vocational training, tevt, univotec

The guidelines formally adopted by the Independent Evaluation Department (IED) on avoiding conflict of interest in its independent evaluations were observed in the preparation of this report. To the knowledge of IED management, there were no conflicts of interest of the persons preparing, reviewing, or approving this report.

In preparing any evaluation report, or by making any designation of or reference to a particular territory or geographic area in this document, IED does not intend to make any judgments as to the legal or other status of any territory or area.

## PROJECT BASIC DATA

<b>Project Number:</b>	35197	<b>PCR Circulation Date:</b>	Nov 2012	
<b>Loan Number:</b>	2197	<b>PCR Validation Date:</b>	Dec 2014	
<b>Project Name:</b>	<b>Technical Education Development Project</b>			
<b>Country:</b>	Sri Lanka		<b>Approved</b> (\$ million)	<b>Actual</b> (\$ million)
<b>Sector:</b>	Education	<b>Total Project Costs:</b>	26.70	24.00
<b>ADB Financing:</b> (\$ million)	<b>ADF:</b> 20.00	<b>Loan:</b> (SDR equivalent, million)	20.00	20.14
		<b>Borrower:</b>	13.61	12.97
	<b>OCR:</b> 0.00	<b>Beneficiaries:</b>	6.70	3.90
		<b>Others:</b>	0.00	0.00
<b>Cofinancier:</b>		<b>Total Cofinancing:</b>	0.00	0.00
<b>Approval Date:</b>	21 Nov 2005	<b>Effectiveness Date:</b>	19 Jan 2006	19 Apr 2006
<b>Signing Date:</b>	19 Jan 2006	<b>Closing Date:</b>	31 Aug 2011	31 Aug 2011
<b>Project Officers:</b>	L.C. Gutierrez L.C. Gutierrez A. Gamaathige J. Peththawadu N. Gunasekera	<b>Location:</b>	<b>From:</b>	<b>To:</b>
		ADB headquarters	Nov 2005	Nov 2007
		Sri Lanka Resident Mission	Dec 2007	Feb 2008
		Sri Lanka Resident Mission	Mar 2008	Feb 2010
		Sri Lanka Resident Mission	Mar 2010	Dec 2010
Sri Lanka Resident Mission	Mar 2011	Aug 2011		
<b>Validator:</b>	K. Hardjanti, Consultant	<b>Peer Reviewer:</b>	H. Son, Principal Evaluation Specialist, IED1	
<b>Quality Reviewer:</b>	E. Gozali, Principal Evaluation Specialist, IED1	<b>Director:</b>	W. Kolkma, IED1	

ADB = Asian Development Bank; ADF = Asian Development Fund; IED1 = Independent Evaluation Department, Division 1; OCR = ordinary capital resources; PCR = project completion report; SDR = special drawing rights.

## I. PROJECT DESCRIPTION

### A. Rationale

1. In its effort to respond to the changing labor market, the Government of Sri Lanka needed highly trained labor, such as technicians and mid-level professionals. However, despite the huge supply–demand gap, unemployment, particularly among educated youth, was high. The technical education and vocational training (TEVT) was underdeveloped. TEVT could not produce enough qualified, skilled workers for either the domestic or foreign job markets.

2. The Technical Education Development Project<sup>1</sup> was the fourth project in Sri Lanka in TEVT<sup>2</sup> subsector funded by the Asian Development Bank (ADB) since 1983. The project's goal

<sup>1</sup> ADB. 2005. *Report and Recommendation of the President to the Board of Directors: Proposed Loan to Sri Lanka for the Technical Education Development Project*. Manila.

<sup>2</sup> The first three ADB-funded TEVT projects were designed and implemented during the 25 years of civil strife that dominated Sri Lanka's political, social, and economic development.

was to strengthen the institutional capacities of six technical colleges in six of the nine provinces, a teacher training institution, and relevant government ministries, thereby enabling TEVT to meet labor market demand for higher-level technicians and technologists. In parallel, development partners were supporting three technical colleges in the remaining three provinces.

## **B. Expected Impact**

3. The project was expected to develop more mid-level and highly skilled human resources that is much needed for Sri Lanka's national economic growth and social development.

## **C. Objectives or Expected Outcome**

4. The project's expected outcome was to achieve improved access and strengthened capacity of TEVT to meet the labor market needs of the country for both domestic deployment and overseas demand.

## **D. Outputs**

5. The project had three components with the following outputs:

- (i) Component 1—Develop colleges of technology (COTs) with a view to getting (a) administration and operational systems strengthened, (b) strategic planning and entrepreneurial management system established, (c) technician curriculum and student selection procedures developed and implemented, (d) equipment and facilities upgraded, and (e) staff capacity strengthened.
- (ii) Component 2—The Ministry of Skills Development, Vocational and Technical Education (MSDVTE) and other entities to get their (a) output-based budgeting system developed, (b) TEVT sector policy analysis and planning strengthened, (c) national vocational qualification (NVQ) and standards for technologists and technicians established, and (d) TEVT quality assurance strengthened.
- (iii) Component 3—The University of Vocational Technology (Univotec) to get its (a) academic and operational systems, including its corporate capacity developed; (b) administration capacity and academic and technical staff strengthened; (c) degree programs in technical education and technology developed and implemented; and (d) facilities for technical education and technology upgraded and equipment provided.

## **E. Provision of Inputs**

6. The total project cost at appraisal was estimated at \$26.7 million equivalent, including taxes, duties, interest charges on the ADB loan, and physical and price contingencies. The foreign exchange cost was estimated at \$9.9 million (37%), and the local currency cost at \$16.8 million (63%) equivalent. The loan was to cover 75% of the total project cost. ADB would fund the \$20 million equivalent comprising 100% (\$9.9 million) of the foreign currency cost and 60% (\$10.1 million equivalent) of the local currency cost. The actual total project cost at completion was \$24.0 million.

7. At appraisal, the government was to provide the remaining \$6.7 million equivalent of the local currency cost. The actual cost supported by the government at completion was \$3.9 million.

## F. Implementation Arrangements

8. Several changes in the composition of ministries handling TEVT took place from project appraisal until completion. The MSDVTE was the executing agency at appraisal. Then the project's executing agency changed twice during project implementation period, from the Ministry of Vocational and Technical Training to the Ministry of Youth Affairs and Skills Development. The project completion report (PCR)<sup>3</sup> maintained that these changes did not affect implementation since the core subject of TEVT was consistent as a responsibility of each of the ministries.<sup>4</sup>

9. The project steering committee (PSC) was set up at inception. In the beginning, it had 21 members, which eventually expanded to 30 members. The PSC held nine meetings during the implementation period. Because of the elections and the transition of ministries, no meetings were conducted in 2010 and 2011.

10. Out of 33 loan conditions and covenants, only 28 were fully complied with, four conditions were partially complied with, and one not complied with. The crucial covenants that were not fully complied with were (i) the appointment of teachers, (ii) ensuring the replacement of teachers due to participation in training, and (iii) the delegation of budget management authority to COT directors.

## II. EVALUATION OF PERFORMANCE AND RATINGS

### A. Relevance of Design and Formulation

11. The PCR rated the project *relevant* based on (i) the project's consistency with the government's strategy to strengthen the TEVT sector; (ii) the ADB country strategy that supported the development of the TEVT sector to reduce high levels of youth unemployment; (iii) the project's concept that supported the government's priorities and long-term development plans, which may eventually contribute to poverty reduction; and (iv) the project's strong foundation from previous and ongoing ADB support in the TEVT sector that was in line with the ADB country strategy and program priorities for social development. Moreover, in formulating the project, some issues that were identified in the policy document were included in the design.

12. However, the formulation of the project revealed certain inadequacies in its design. The project proposed to develop the NVQ framework as an alternative route to tertiary education. It offered to develop a step-by-step progression from craft level skills to technologist level, proceeding sequentially from NVQ1 to NVQ7 (PCR, paras. 12, 49, and 50). However, policy preparations required for such an institutional change were not fully firmed up. The government did not recruit full-time teachers in COTS to make the course programs operational. Students who were expected to join the NVQ levels 5, 6, and 7 did not possess requisite qualifications in English, mathematics, and sciences to be eligible for those classes. The project's assumption that students would have achieved these competencies from their on-the-job experience turned out to be incorrect (PCR, para. 10). Hence, there was a shortage of enrollment in these courses. Without full-time students and full-time teachers, the proposed technical education system had little prospects of taking roots and achieving its objectives.

<sup>3</sup> ADB. 2012. *Completion Report: Technical Education Development Project in Sri Lanka*. Manila.

<sup>4</sup> At first, the plan was to retain and continue with the same personnel of the Skills Development Project (SDP) project implementing unit. This arrangement was to ensure that an adequate number of staff with expertise and experience gained from the SDP will continue the work for the project. However, the executing agency demanded to advertise all positions again.

13. Further, COTS- and Univotec-based educational stream was going to have higher unit costs than the conventional tertiary education (PCR, para. 56). However, the government was not willing to provide additional finances, nor push for higher user-fee to be charged. Under the circumstances, the technical education design being proposed was not viable. These structural weaknesses in the design prevented the project from anticipating student demand for targeted TEVT courses correctly. This was essential for the project's success. Low enrolments hampered the project performance and many of the project activities, though good and useful in themselves, could not blossom to their full potential and remained nonviable.

14. The PCR maintained that the timing of the project preparation was premature. It considered that if the timing of the Technical Education Development Project (TEDP) Report and Recommendation to the President's (RRP) approval would have allowed adequate time to assess the outcomes of the then running Skills Development Project (SDP) and take its lessons on board, the project design would have benefitted.<sup>5</sup> The PCR argued that the design process for TEDP had started 4 years before the completion of SDP, hence, remained uninformed of its implementation issues. The completion report of the SDP with its lessons was issued 18 months after the TEDP approval. Although this reasoning may be logical, this is not the only reason for deficiencies in project formulation. The problems of youth unemployment, unmet demand for skills, and in tertiary and technical education are persistent in Sri Lanka, and ADB had been involved there since 1983. These issues have been studied a number of times by both ADB and the government. Granting that the appraisal team did not have the benefits of the earlier lessons, the line ministry and field agencies involved in the SDP could have drawn the attention of the TEDP appraisal team to sector-specific issues.

15. To conclude, the project appraisal did not enjoy a firm policy environment and the government's commitment, the project's estimated student demand for technical programs was incorrect, and its timing did not benefit from the SDP. This validation rates the project *less than relevant*.

## **B. Effectiveness in Achieving Project Outcome and Outputs**

16. The project was rated *effective* by the PCR because (i) most of the project's expected outcomes were achieved even if the project start-up was delayed; (ii) Univotec was established; and (iii) renovation of colleges have improved the learning facilities, particularly for information and communication technology.

17. However, there were a number of downsides. These include (i) the lack of teachers, which hampered the actual output for technical diploma programs; (ii) the limited benefit attained from the short-term staff training due to late scheduling, large numbers to be trained, and some irrelevant training; (iii) the project's support for civil works to refurbish and expand COT facilities, which only marginally increased the institutional capacity of the existing technical colleges to augment output and achieve outcomes;<sup>6</sup> (iv) the policy during the project's lifetime, which caused extremely low or no student enrollment at most COTs in NVQ 6, as most students leave after NVQ 5 and go directly to Univotec (NVQ 7); and (v) the project's focus on NVQ 5 and 6 programs at COTs and NVQ level 7 at Univotec, which had minimal consideration for the foundation levels of NVQ 1 to 4. Hence, the concept of step-by-step improvement from craft to

<sup>5</sup> ADB. 1999. *Report and Recommendation of the President to the Board of Directors on a Proposed Loan to the Democratic Socialist Republic of Sri Lanka for the Skills Development Project*. Manila.

<sup>6</sup> At one COT, the project's support, i.e., the car hoist and shelter were not used and the welding workshop remained closed because there were no teachers and no students, so the new and renovated facilities neither increased capacity nor extended services to a broader range of students.

technologist could not be implemented by the project. The PCR observed that students who were to potentially benefit from the project did not come from the poor families. Disproportionate emphasis was laid on strengthening ministries and developing elaborate systems while there was little increase in enrollment and teachers. This validation rates the project's effectiveness in achieving its outcome *less than effective*.

### **C. Efficiency of Resource Use in Achieving Outcome and Outputs**

18. For efficiency of resource use in achieving outcome and outputs, the PCR rated the project *less efficient*. This rating was based on the following justifications: (i) very low student enrollment in COTs;<sup>7</sup> (ii) strengthening the ministry through study tours and short-term training was hardly useful as some functionaries went on multiple or irrelevant visits; (iii) the lack of a properly functioning education management information system (EMIS) caused inefficiencies in student records management, in the continuous assessment of student competencies, and in the tracking of students after qualifying and entering the job market; and (iv) the economic internal rate of return (EIRR) was recalculated at 6.3% compared to 20.4% at appraisal.<sup>8</sup> The lower EIRR (6.3% compared to 20.4% at appraisal) was due to the much lower number of students. The PCR summarized this by saying "this is a reflection of the very poor efficiency of the resources utilized" (para. 52).

19. Some positive aspects that were mentioned in the PCR were that (i) the Univotec would have a great potential for efficiency in future; and (ii) the late start, plus the major civil works, procurement, staff, and new program development resulted in low student output but excellent institutional capacity development that would be expected to enable greater efficiency in the years to come. This validation rates the project *less than efficient*.

### **D. Preliminary Assessment of Sustainability**

20. The PCR provided a rating of *less likely sustainable* for the project's preliminary assessment of sustainability. Although the government seemed to have a strong commitment to improve TEVT, it would be difficult to sustain project benefits unless the issues relating to financial allocations and operational autonomy of the sector were resolved. The Department of Technical Education and Training allocates and controls operating budgets. COTs have extremely limited responsibility for the meager operating funds. Any revenue generated by the COT must be deposited in the central revenue account. The financial constraint hinders the recruitment of teachers. The PCR observed that the sustainability of the project relies heavily on the recruitment, appointment, and retention of full-time technical teachers to fill vacant positions.

21. To sustain the project's outputs and outcomes, one of the teachers' main responsibilities is to organize, manage, and maintain laboratories and workshops in clean and safe operating conditions. The project prepared maintenance manuals for each COT, but these manuals were not used. Shortages of full-time teaching staff and most teachers' refusal to be responsible in maintaining laboratories and workshops are obstacles in providing quality TEVT. Active

<sup>7</sup> The main cause of low student enrollment appears to be the challenges faced by the Public Service Commission to recruit, select, and appoint technical teachers. This has resulted in the closing of programs and for project-supported facilities and equipment to be unused, such as the biomedical program at Maradana COT, and the welding program at Kurunegala COT. The construction technology programs at Anuradhapura and Ratnapura COTs have few enrollees because only part-time teachers were available to teach, and only on weekends.

<sup>8</sup> This reflected the low efficiency of the resources used under the project. Economic benefits were measured at appraisal as the incremental earnings of the different categories of graduates who received project-funded support. The main reason for the low EIRR was the low benefits stream realized from project benefits due to the much lower than targeted student enrollment at Univotec and COTs. Among the underlying reasons for the low efficiency is the shortage of teachers at the COTs and the delay in establishing the Univotec.

teaching and learning require consumable supplies and instructional materials, which contribute to the higher operating cost of TEVT. In the absence of larger financial allocations from the government or employers, or user fees, sustainability is likely to be low. Concurring with the PCR, this validation also preliminarily assesses the project *less than likely sustainable*.

## **E. Impact**

22. The PCR listed key areas that could have positive impact over the next 10 years after project completion. However, it provided no rating on the project's preliminary impact. In terms of social impacts, the poverty impact of the project was minimal as most students who had access to project resources and moved up from NVQ levels 5 and 6 were from non-poor families. However, there were some positive impact in terms of gender and development. Female enrollment in the TEVT courses of the Department of Technical Education and Training increased from 37.0% in 2003 to 40.5% in 2011. Hopefully, the high unemployment rate among educated females would be reduced with new job opportunities.

23. On institutional development, the continued support to expand the NVQ framework has improved the image of TEVT and demonstrated how youth could progress steadily in vocational and technical careers. In terms of environment, the PCR noted adverse or positive impacts. This validation rates the project's preliminary impact *moderate*.

## **III. OTHER PERFORMANCE ASSESSMENTS**

### **A. Performance of the Borrower and Executing Agency**

24. The PCR rating for the borrower's performance was rather ambiguous. The PCR gave an overall rating of *satisfactory*. It acknowledged the executing agency's timely provision of support to ensure project implementation, and that the PSC, subcommittees, and task groups made decisions on instructional programs, design, and policy matters in a collaborative manner. The project implementation unit guided consultants and informed the stakeholders of progress. However, there was a caveat that the delay in the recruitment and appointment of full-time teachers was unsatisfactory.

25. It was repeatedly underscored in the PCR that the timely appointment of full-time teachers was crucial for the project's success. The lack of teachers to train the intake of COT students and optimize the use of the state-of-the-art equipment, training materials, and upgraded facilities was a main obstacle in achieving project objectives. In addition, the borrower and/or the executing agency did not conduct any meetings for 2 years (2010 and 2011). The reasons given for the absence of meetings during those years were the elections and the changing of ministries in the country. There were concerns that the project was operating independently from key authorities, departments, and institutions that should have exercised ownership of the project. It was also vital that there is sufficient coordination among government ministries in managing the TVET system, and yet this was observed as weak. Hence, this validation rates the performance of the borrower and executing agency *less than satisfactory*.

### **B. Performance of the Asian Development Bank**

26. In 7 years, from June 2005 until July 2012, ADB fielded nine missions—1 inception mission, 1 special project administration mission, 4 loan review missions, 1 special loan review mission, 1 midterm review mission, and 1 project completion review mission.



27. The PCR rated the performance of ADB *partly satisfactory*. The basis for this rating were (i) the premature timing of the project preparation; (ii) the satisfactory rating given by all project review missions when there were unsolved problems to be tackled; (iii) ADB and the *borrower* should have taken action to mitigate the problems resulting from the delay in passing the Univotect Act and the failure to recruit and appoint teachers; (iv) the project design did not take into account the lessons derived from the SDP or its recommendations (in the SDP PCR, which was completed 18 months after the project's approval); and (v) only the project's loan appraisal mission and the project completion review mission included a TEVT specialist. Therefore, this validation rates the performance of ADB *less than satisfactory*.

#### IV. OVERALL ASSESSMENT, LESSONS, AND RECOMMENDATIONS

##### A. Overall Assessment and Ratings

28. The PCR gave an overall rating of *partly successful—relevant, effective, less efficient, and less likely sustainable*.

29. In summary, the basis of the *partly successful rating* included the following: (i) the project concept was in line with the government's priorities and development objectives; (ii) the NVQ framework showed that students could move into vocational and technical careers and improve earning capacity; (iii) the social marketing campaign, gender and social equity activities, and career guidance counseling gave an enhanced image of TEVT as a viable tertiary education option; (iv) although COT buildings were renovated, facilities expanded, new equipment procured, and new instructional materials designed and produced, these only marginally increased the institutional capacity of COTs due to the lack of teachers; (v) some of the short-term local and overseas study tours and training programs participated by a large number of staff from COTs, Univotec, and institutions were ineffective; (vi) the project developed a gender action plan and a social equity strategy, and all COTs developed their own gender action plans, but there was little or no response from the ministry on the gender and social equity policy and there was no attempt to address these concerns in other TEVT agencies; (vii) some efforts to implement new management concepts and systems were inadequate, with too much emphasis on strengthening government ministries and developing elaborate output-based budgeting, EMIS, labor market information system, and quality assurance systems; and (viii) most students who used the project's opportunities to move up from NVQ levels 5 and 6 were from non-poor families, so the impact to poverty reduction was very limited.

30. This validation provides an overall rating of *less than successful—less than relevant, less than effective, less than efficient, and less than likely sustainable*.

##### Overall Ratings

Criteria	PCR	IED Review	Reason for Disagreement and/or Comments
Relevance	Relevant	Less than relevant	As designed, the project did not enjoy firm policy support, estimated student demand was incorrect, and its timing could not utilize lessons from the SDP (paras.11–15).
Effectiveness in achieving project outcome and outputs	Effective	Less than effective	The project did not produce the expected outputs and outcome due to low student enrollment and shortage of full-time teachers (paras. 16–17).

Efficiency in achieving outcome and outputs	Less efficient	Less than efficient	
Preliminary assessment of sustainability	Less likely sustainable	Less than likely sustainable	
<b>Overall assessment</b>	<b>Partly successful</b>	<b>Less than successful</b>	
Borrower and executing agency	Satisfactory	Less than satisfactory	Too many changes in the executing agency, the PSC did not meet for 2 years, and failed to exercise full control by keeping project implementation on track (para. 25).
Performance of ADB	Partly satisfactory	Less than satisfactory	
Impact	Not rated	Moderate	Please refer to paras. 22–23.
Quality of PCR		Satisfactory	Please refer to paras. 35–36.

ADB = Asian Development Bank, IED = Independent Evaluation Department, PCR = project completion report, PSC = project steering committee, SDP = Skills Development Project.

Note: From May 2012, IED views the PCR rating terminology of "partly" or "less" as equivalent to "less than" and uses this terminology for its own rating categories to improve clarity.

Source: ADB Independent Evaluation Department.

## B. Lessons

31. The PCR derived seven lessons from the project. Two of these were related to teachers' competencies and their capacity to evaluate student performance, and the importance of having competent, full-time teachers to provide theoretical and practical instruction to students. Civil works, procurement of teaching equipment, and development of new programs and supporting instructional materials are of little use if teachers were not effectively recruited and appointed.

32. Two other lessons were on the inadequacy of time to implement the project. The remaining three lessons were as follows: (i) the effectiveness of short-term study tours and training relies on the relevance of the topics to the conditions in Sri Lanka, (ii) social marketing and career guidance efforts are only as effective as the reliability and quality of the TEVT programs being taught, and (iii) addressing gender concerns in the overall mandate or in the TEVT sector should be considered a priority by the ministry to ensure effective implementation. This validation considers student demand for TVET and coordination among ministries in ensuring improvements in the TVET system crucial to achieve positive results and should be included as lessons derived from this project.

## C. Recommendations for Follow-Up

33. The PCR gave a long list of recommendations for follow-up, categorized into two. The first list was project related while the other was more of general recommendations. This validation supports these and adds one more recommendations—and this is to undertake student demand assessment for TVET.

## V. OTHER CONSIDERATIONS AND FOLLOW-UP

### A. Monitoring and Evaluation Design, Implementation, and Utilization

34. The monitoring and evaluation system and other project-related data collection and monitoring system were put in place. As is mandatory in all PCRs, this PCR included the

project's design and monitoring framework in Appendix 1. The framework was sufficiently detailed. It was presented in 15 pages and used data sources from and/or monitoring mechanisms of the project's baseline, the EMIS, the MSDVTE, the Ministry of Education, tracer studies, quarterly progress reports, and review mission reports. However, the implementation and use of monitoring and evaluation practices were not always adequate.

## **B. Comments on Project Completion Report Quality**

35. The PCR was consistent with ADB guidelines on preparing a PCR. In general, it provided adequate evidence and analysis to substantiate its ratings. Its assessment of the project was comprehensive and included the necessary details. It made appropriate analysis of the strength and weaknesses of project preparation and implementation. The PCR included a sound and detailed EIRR and it identified the exogenous factors affecting project results.

36. The PCR could be improved by being more succinct in presentation, thereby enabling a much clearer message. For example, it provided a long list of lessons and even a longer list of recommendations for follow-up. Some of these could be grouped together, or could be presented in brief and clear messages. As presented in the PCR, the more important messages tended to be diluted. To ensure that recommendations are diligently being followed-up, it is necessary to prioritize or highlight the most important ones. Overall, this validation rates the PCR quality *satisfactory*.

## **C. Data Sources for Validation**

37. Data sources for this PCR validation were derived from the (i) PCR, dated November 2012; (ii) RRP, dated 31 October 2005; (iii) various loan review mission reports, dated 10 April 2007; (iv) report of the midterm review mission; and (v) other relevant documents and/or reports.

## **D. Recommendation for Independent Evaluation Department Follow-Up**

38. None is recommended by this validation.