



Validation Report

Reference Number: PVR-227
Project Number: 33396
Loan Number: 1864(SF) and 1865(SF)
December 2012

Cambodia: Education Sector Development Program

Independent Evaluation Department

Asian Development Bank

ABBREVIATIONS

ADB	–	Asian Development Bank
EMIS	–	education management information system
IED	–	Independent Evaluation Department
M&E	–	monitoring and evaluation
MOEYS	–	Ministry of Education, Youth, and Sport
PCR	–	program completion report
SSC	–	school support committee
TA	–	technical assistance
TTC	–	teacher training college
TVET	–	technical and vocational education training

NOTE

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

Key Words

basic education, education sector development program, education management information system, program completion report, project implementation, validation, provincial training center, technical and vocational education training

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PROGRAM AND/OR PROJECT BASIC DATA

Project Number:	33396	PCR Circulation Date:	Jun 2009	
Loan Number:	1864(SF) and 1865(SF)	PCR Validation Date:	Dec 2012	
Project Name:	Education Sector Development Program			
Country:	Cambodia		Approved (\$ million)	Actual (\$ million)
Sector:	Education Sector Development	Total Project Costs	42.50	44.43
ADB Financing: (\$ million)	ADF: 38.00	Loan:	38.00	41.04
		Program Loan	20.00	21.43
		Project Loan	18.00	19.61
	OCR: 0.00	Borrower:	4.50	3.40
		Beneficiaries:	0.00	0.00
		Others:	0.00	0.00
Cofinanciers:		Total Cofinancing:	0.00	0.00
Approval Date:	4 Dec 2001	Effectiveness Date:	28 May 2002	12 Apr 2002
Signing Date:	27 Feb 2002	Closing Date:		
		Program Loan	31 Aug 2004	29 Nov 2004
		Project Loan	30 Jun 2007	18 Sep 2008
Project Officers:	N. Larocque S. Brar P. Chang G. Forsberg	Location:	ADB headquarters ADB headquarters ADB headquarters ADB headquarters	
Validator:	S. Lohani, Consultant	Peer Reviewer:	L. Arthur, Senior Evaluation Specialist, IED1	
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ADB = Asian Development Bank, ADF = Asian Development Fund, IED1/2 = Independent Evaluation Department (Division 1/2), OCR = ordinary capital resources, PCR = project completion report.

I. PROJECT DESCRIPTION

A. Rationale

1. The Government of Cambodia recognized that equitable access to 9 years of good quality basic education would assist the majority of Cambodia's poorest families by focusing on two key aspects of poverty: low productivity and weak governance. The system was characterized by inequitable access, especially for the poor, girls, and indigenous peoples, and low quality with high repetition and dropout rates. A low level of public expenditure on education had been a major constraint to human resource development. The Government's policy priority for education was to ensure equitable access and quality improvement for nine years of basic education by 2010.

B. Expected Impact

2. The report and recommendation of the President (RRP)¹ of the Asian Development Bank (ADB) stated that the Education Sector Development Program was expected to increase

¹ ADB. 2001. *Report and Recommendation of the President to the Board of Directors on Proposed Loans to the Kingdom of Cambodia for the Education Sector Development Program*, (Loan 1864/65-CAM, for \$38 million).

access to better quality basic education, thus elevating the educational attainment of new entrants into the workforce and thereby contributing to poverty reduction in Cambodia.

C. Objectives or Expected Outcomes

3. The program was expected to help in (a) reforming and strengthening the education sector, primarily basic education, within the framework of the government's Education Strategic Plan 2001–2005 and Education Sector Support Program; (b) implementing policy reforms nationwide to improve education sector financing, make education more accessible to poor students, improve learning, deliver education services more efficiently and transparently, and decentralize management; (c) implementing policies that would give the underserved and disadvantaged population more equitable access to better quality education; and (d) providing bridging support for technical and vocational education and training (TVET).

D. Components and Outputs

4. The program had three components: (i) **Policy**—This component promoted policies that would (a) assure increased resources to the education sector, (b) make access to education more equitable, (c) improve the quality and efficiency of education, and (d) strengthen managerial capacity throughout the sector and deconcentrate service delivery; (ii) **Capacity building**—This component would (a) establish deconcentrated and decentralized mechanisms for the development of education facilities; (b) set up an effective internal accounting and audit function within the Ministry of Education, Youth, and Sport (MOEYS) to ensure compliance with the new government audit law; and (c) develop institutional capacity for TVET; and (iii) **Project**—To supplement the policy initiatives, this component would (a) make access to education (mainly basic education) easier and more equitable; (b) deconcentrate and decentralize planning, management, and monitoring; and (c) institute selective improvements in quality and efficiency in budget planning, accounting and audit, and TVET.

E. Provision of Inputs

5. The program was to provide a policy loan of \$20.0 million equivalent and an investment project loan of \$22.5 million equivalent. At the program completion, a total of \$44.4 million was disbursed, 4.5% higher than the appraisal estimate of \$42.5 million. The actual cost of the program loan exceeded the appraisal estimate by 7% because of the appreciation of special drawing rights. The government contributed \$3.4 million, only 7.6% of the actual program cost of \$44.4 million. Compared with the appraisal estimates, the actual costs were \$1.6 million higher for civil works, \$0.5 million higher for consulting services, and \$0.84 million higher for equipment and vehicles.

F. Implementation Arrangements

6. The program implementation arrangements involved (a) forming an inter-ministerial steering committee to oversee progress and compliance with policy conditions and procedures; (b) creating a task force, headed by a project director and with a staff of 18, to coordinate the investment activities; (c) hiring a team of consultants (six international and seven national) to help the task force implement the project activities; (d) engaging the assistance of provincial education facility committees under 21 provincial governments in planning and site selection for civil works; (e) relying on support from the school support committees (SSCs) in the implementation of civil works; and (f) obtaining additional funds for civil works in 65 schools from an international nongovernment organization, American Assistance for Cambodia.

7. The program loan was expected to close on 31 August 2004, and it actually closed on 29 November 2004. The project loan, which was expected to close on 30 June 2007, closed on 18 September 2008, 15 months later. The project implementation period was extended to allow the completion of additional civil works with funds that resulted from the appreciation of special drawing rights against the dollar and the reallocation of unallocated funds, and to make up for delays in the procurement of TVET and science equipment.

8. **Conditions and covenants.** The PCR states that the conditions and covenants were generally complied with, with one policy condition relating to the MOEYS' failure to meet its target for the number of teachers redeployed, only partly complied with. Although the text reports full compliance with covenants, this validation finds that at least two were not fully met: (a) compliance with the education service rationalization plan, and (b) undertaking of benefit M&E activities by the MOEYS. Also, certain aspects of policy actions were not fully implemented. For example, supply of core textbooks was found discontinued after procurement was centralized in the new Publishing and Distribution House in 2002.² While this validation agrees that most conditions and covenants were met, the PCR should have offered more details concerning conditions and covenants that were only partly complied with.

9. **Technical assistance.** The PCR indicates that ADB provided no advisory technical assistance (TA) to support program implementation. However, this validation found that ADB did provide two complementary assistance projects: a stand-alone TA project to strengthen the capacity of the MOEYS in expenditure planning, programming, and performance monitoring of the education sector, and a grant project to support the implementation of policy reforms.³

10. **Procurement and consultant performance.** The PCR does not mention any major procurement problems, except delays in the procurement of equipment for TVET and science laboratories, due to limited local suppliers and availability. Six international consultants and nine national consultants were recruited through a single firm. The PCR rates the performance of consultants, civil works contractors, and suppliers of equipment and goods *satisfactory*.

11. This validation report concurs with the PCR findings regarding the performance of consultants, contractors, and suppliers. However, according to some back-to-office reports, implementation problems resulted from (a) the replacement of the team coordinator and/or facilities specialist and secondary curriculum specialist by the consulting firm, and (b) the failure to resolve the issue of procurement of instructional materials (core textbooks) through the Publishing and Distribution House. Both issues should have been mentioned in the PCR.

II. EVALUATION OF PERFORMANCE AND RATINGS

A. Relevance of Design and Formulation

12. The PCR considers the design and formulation of the program *highly relevant* because it was (a) fully consistent with the government's education policies and strategies for education development; (b) fully consistent with ADB's country operational strategy for Cambodia (2000);⁴ and (c) linked to key sector challenges, including low public spending on education, significant inequity in enrollment, low net enrollment ratios in lower and upper secondary schools, low

² The Publishing and Distribution House was established to fulfill a covenant for ADB. ADB. 1996. *Basic Education Textbook Project in Cambodia*. Manila (Loan 1446-CAM), which was completed on 30 April 2002.

³ ADB. 2002. *Technical Assistance for Performance Management in the Education Sector of the Kingdom of Cambodia*. Manila (TA 3858); ADB. 2002. *Targeted Assistance for Education of Poor Girls and Indigenous Children in Cambodia*. Manila (Grant 9028).

⁴ ADB. 2000. *Country Operational Strategy for Cambodia: Enabling a Socioeconomic Renaissance*. Manila.

quality of education, weak institutional capacity, and severe shortage of suitably qualified teachers and learning materials.

13. While agreeing with the reasons cited in the PCR, this validation report rates the program design and formulation *relevant*, rather than *highly relevant*, because of some design weaknesses, which were also reported in the PCR: (a) the policy reform program covered too many areas that did not match the government's capacity to fully undertake the reforms (footnote 2, paras. 62 and 63); (b) there was a disconnect between outputs and intended outcomes, making achievement of outcomes less likely; (c) the capacity building component relied on fragmented TAs from other development partners, including the Swedish International Development Cooperation Agency (Sida) and the United Nations Children's Fund (UNICEF), instead of an integrated advisory TA (footnote 2, para. 63); (d) the amount of the investment loan allocated for civil works dwarfed the allocation for quality improvement activities, which was not in line with intended outcomes; (e) the design placed little emphasis on developing an effective M&E mechanism and on strengthening the education management information system (EMIS) and establishing baselines for the output and outcome indicators (footnote 2, para. 45, Appendix 2).

B. Effectiveness in Achieving Project Outcome

14. The PCR rates the program *less effective* in achieving its intended outcomes. It mentioned that the targeted improvements in fiscal and education indicators were fully achieved: (i) the government's recurrent budget allocation increased from 15% in 2001 to 19% in 2004; (ii) the proportion of the education budget disbursed increased from 90% in 2000 to 95% in 2006; (iii) the female share in total enrollment increased from 30% in 2000 to 45.6% in 2006–2007 (against the appraisal target of 40%); and (iv) the introduction of decentralized operational budgets in more than 8,628 schools and 24 teacher training colleges (TTCs), and the creation of 194 budget management centers, and delegated authority to school stakeholders.

15. Some targets, however, were only partly achieved or not achieved at all: (i) the survival rate among students in grades 1–6 improved from 45% in 1999 to 53% in 2006–2007 (against the target of 75%); (ii) the repetition rate among students in grades 1–3 improved from 30% in 1999 to 18% in 2005–2006 (against the target of 15% for 2005); (iii) the number of TTC graduates decreased from 4,000 in 2000 to under 3,000 in 2006 (against a targeted increase to 5,500 per year by 2006); (iv) the ratio of textbooks per 100 students in grades 1–6 (the unweighted average for grades 1–6 across four subjects) decreased from 109 in 2000–2001 to 72 in 2005–2006; (v) less than the targeted 100% of TTCs, TVET institutions, and higher-education institutions had their own operational budgets by 2004; and (vi) inadequate autonomy was granted to the National Training Board.

16. Also, because of unavailable data, some indicators related to project objectives were never measured.⁵ Measuring precisely the impact of the program without an effective M&E framework was a challenge. Among the quality and internal efficiency indicators that were not monitored are textbook access ratio for lower secondary students, students' daily attendance, re-publication of the core edition of textbooks, and employers' satisfaction rates with graduates from TVET and higher-education institutions. This validation report concurs with the PCR findings and rates the effectiveness of the program *less than effective*.

⁵ For example, although the gross enrollment ratio in 2006–2007 in remote areas reached 122% for primary schools and 25% for lower secondary schools, effectiveness in achieving the access targets was difficult to assess in the absence of other relevant access indicators (representation of the poorest quintile in grades 1–9, access of non-urban areas to postsecondary education, and private sector participation in education).

C. Efficiency of Resource Use in Achieving Outputs and Outcomes

17. The PCR's efficiency rating was derived on three aspects of the project loan, thus disregarding other important aspects of the project, and entirely disregarding the program. The PCR's efficiency rating is based on: a) 1,798 more classrooms, a higher total than the appraisal estimate, were built; (b) construction cost per classroom was lower than the appraisal estimate for both primary (\$6,402 actual vs. \$7,823 at appraisal) and lower secondary (\$6,185 actual vs. \$8,053 at appraisal) schools; and (c) procurement was well-managed. In addition to these, however, there are several issues related to project efficiency that should have been mentioned in the PCR and considered as part of the rating: (i) The use and maintenance of facilities, including science laboratory equipment and computer laboratories, needed clearer direction and a better definition of responsibilities since the teacher training and resource centers provided in 14 provinces are not being fully used (footnote 2, para. 69); ii) initial delays at program start-up and the long delay in loan closing after the final loan disbursement; iii) some targets were only partly achieved or not achieved at all, notwithstanding the total program disbursement of 4.5% higher than the appraisal estimate; and d) the EMIS was not improved to generate reliable data, hence, many indicators on cost effectiveness and for the project as a whole were not monitored.

18. As the PCR points out, weaknesses in the implementation arrangements were due to the following: (a) involvement of American Assistance for Cambodia added to the responsibilities of the task force and led to misunderstandings; (b) the overlap between task forces for the program and for the second education sector development program,⁶ toward the end of the program, delayed implementation and slowed disbursements; and (c) the absence of an effective monitoring and evaluation (M&E) framework hampered the assessment of program outcomes. The program loan was delayed at start-up, but once the program became effective, activities were accomplished within the estimated time frame, and the policy loan was disbursed in three tranches, broadly according to schedule. Furthermore, frequent missions and the close relationship between the executing agency and ADB enabled efficient implementation of policy conditions. Also, since the majority of policy actions were complied with, government financing of 80% of the total cost of adjustments of program reforms was cost effective.

19. Based on an efficient rating of both the program loan and project loan, this validation finds the overall rating of the program to be *efficient*.

D. Preliminary Assessment of Sustainability

20. The PCR rates the sustainability of the program *likely* because: (a) ADB's follow-up interventions, including the second education sector development program and the Enhancing Education Quality Project approved in 2008,⁷ are carrying forward the policy reforms begun by the program; (b) the government's Education Strategic Plan and Education Sector Support Program have been institutionalized; and (c) the share of education in the government's recurrent budget allocation increased from 14% in 2000 to 19% in 2004. This validation report agrees with the PCR findings and rates the sustainability of the program *likely*. However, no definite conclusion about the financial sustainability of the program can be drawn, as no financial sustainability analysis of the education sector was carried out for the PCR and no information is given in the report about the share of the disbursed recurrent education budget in the total disbursed recurrent budget of the government.

⁶ ADB. 2004. *Second Education Sector Development Program in Cambodia*. Manila (Loan 2121-CAM).

⁷ ADB. 2008. *Enhancing Education Quality Project in Cambodia*. Manila (Grant 0090-CAM[SF]).

E. Impact

21. The PCR did not rate the program impact, although it mentions that the program helped raise the educational attainment of new entrants into the workforce by (i) improving the net enrollment ratio in primary schools and lower secondary schools (although no baseline was identified), (ii) increasing adult literacy rate from 68% in 2000 to 76% in 2006 and the female literacy rate from 58% in 2000 to 64% in 2005, (iii) meeting the net admission rate (90% in 2007–2008 against the target of 90% in 2010), and (iv) increasing the transition rate from primary to lower secondary education (79% in 2006–2007 against the target of 90% in 2006). The program also (a) supported policy reforms for sector-wide development; (b) strengthened the capacity of the MOEYS for education planning and budget preparation; (c) laid the foundation for an internal audit system in the MOEYS; (d) supported the introduction of targeted assistance to poor girls and provided incentives for teachers in remote and rural areas; and (e) increased community involvement in the provision of civil works, thereby empowering the communities and increasing their sense of ownership.

22. This validation finds the impact as likely to be *moderate*, based on a *less than effective* rating in attaining outcomes. However, it is also acknowledged that the program has contributed to improving enrollment, transition, and adult literacy. Also, the policy reforms, including the abolition of informal payments, the strengthening of financial planning and budgeting, guidelines on deployment and redeployment of education personnel, incentives for those in remote and disadvantaged areas, and curriculum development and adoption of new curriculum standards, are likely to have an impact on access and to a lesser degree on quality in the short to medium term.

III. OTHER PERFORMANCE ASSESSMENTS

A. Performance of the Borrower and Executing Agency

23. As indicated in the PCR, the performance of the MOEYS was (a) *highly satisfactory* in its timely compliance with the conditions for the release of the three tranches of the policy loan; (b) *satisfactory* in implementation of the project loan due to the early completion of civil works at a lower cost per classroom than the appraisal estimate; and (c) *unsatisfactory* in the execution of project M&E, as the MOEYS failed to put in place an effective M&E system or to assess employer satisfaction with TVET and higher-education graduates through surveys.

24. This validation report concurs with the PCR findings mentioned above and rates the performance of the government and the MOEYS *satisfactory*. It also notes that program implementation was hampered by (a) delay in obtaining counterpart funding, and (b) the transfer of TVET implementation responsibility from the MOEYS to the Ministry of Labor and Vocational Training.

B. Performance of the Asian Development Bank

25. The PCR rates the performance of ADB *satisfactory*. ADB facilitated the successful completion of the program by: (a) fielding 10 review missions; (b) monitoring program implementation and attending promptly to, and resolving emerging issues; (c) conducting field visits, which allowed tight supervision of civil works and improvements in quality; and (d) maintaining an excellent working relationship with the MOEYS and the task force that implemented the project component, and with the project consultants. However, the PCR adds

that ADB did not give enough support to the MOEYS to ensure the timely availability of quality data for measuring and evaluating the program results.

26. This validation report agrees with these PCR findings and rates the performance of ADB *satisfactory*, while noting that, although the majority of program resources went to civil works (project component), none of the ADB review missions included a civil engineer or an M&E specialist.

C. Others

27. The PCR does not report problems related to safeguards, governance, or anticorruption issues.⁸ This validation found no safeguard violations or major unintended negative consequences.

IV. OVERALL ASSESSMENT, LESSONS, AND RECOMMENDATIONS

A. Overall Assessment

28. The PCR rated the program *successful* overall because it was considered *highly relevant*, *efficient* in achieving outputs and outcomes. This validation report concurs with the PCR overall rating of *successful* as it is *relevant*, *less than effective*, *efficient*, and *likely* to be sustainable (see table).

Overall Ratings

Criteria	PCR	IED Review	Reason for Disagreement/Comments
Relevance	Highly relevant	Relevant	The relevance rating is downgraded due to several design weaknesses (para. 14).
Effectiveness in achieving outcome	Less effective	Less than effective	
Efficiency in achieving outcome and outputs	Efficient	Efficient	
Preliminary assessment of sustainability	Likely sustainable	Likely sustainable	
Overall assessment	Successful	Successful	
Borrower and executing agency	Not rated	Satisfactory	Overall, the performance of the borrower and the executing agency was <i>satisfactory</i> . The performance was <i>highly satisfactory</i> for the program loan, <i>satisfactory</i> for the project loan, and <i>unsatisfactory</i> in the execution of M&E.
Performance of ADB	Satisfactory	Satisfactory	
Impact	Not rated	Moderate	The anticipated impact is judged to be moderate, based on a <i>less than effective</i> achievement of outcomes. However, program outputs will likely have an impact on access and to a lesser degree on quality (para. 23).

⁸ The project was investigated by ADB's Office of Anticorruption and Integrity but the case was closed due to insufficient evidence.

Criteria	PCR	IED Review	Reason for Disagreement/Comments
Quality of PCR		Satisfactory	See section V.B., para. 35.

ADB = Asian Development Bank, IED = Independent Evaluation Department, M&E = monitoring & evaluation, PCR = project completion report.

Note: From May 2012, IED views the PCR's 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

29. The PCR identifies several important lessons from the program: (a) an effective system of progress monitoring of output and outcome indicators should be designed and baselines for these indicators established at program startup; (b) sharper prioritization of reform aligned with the government's capacity helps to generate more significant impact; (c) the effective implementation of policy reforms requires a comprehensive and coordinated TA in support of the reforms; (d) consultants' support should continue until the recommendations are fully implemented and outstanding issues resolved; and (e) the timely completion of civil works, ensuring quality, maintenance, and utilization of facilities requires (i) adequate training of communities for community contracting; (ii) adequate consultation with user groups before implementation; (iii) efficient planning, a well-executed work plan, and strong oversight by the executing agency and the consultants; (iv) closer supervision and monitoring at all levels; and (v) provision of training and funds for maintaining school facilities.

30. This validation report concurs with the above lessons and suggests further lessons as follows: (a) the overall design of a sector development program should be well considered to ensure that outputs will lead to the intended outcomes, and that the design is based on a realistic assessment of the government's capacity to meaningfully implement the entire reform agenda; (b) adequate coordination, supported by an appropriate mix of program loan, project loan, and advisory TA from ADB, is needed for the effective implementation of sector-wide approaches; and (c) effective program loan implementation requires political stability, strong ownership and commitment on the part of the government to implement reforms in education.

C. Recommendations for Follow-up

31. The PCR provides general and program-related recommendations. The recommendations pertaining to the program are to (a) establish output and outcome indicators from the start, obtain credible data sources for output and outcome indicators, and regularly review progress against the design and monitoring framework; (b) establish simple conditions for loan effectiveness, to address and resolve important and critical conditions before loan negotiation; (c) prioritize conditions for tranche release and provide supporting TA in critical areas; (d) streamline implementation arrangements, with greater provincial education facility committee and SSC involvement in civil works supervision and accountability; (e) balance hardware and software components, giving priority to equitable access, budget planning, curriculum development, and textbook procurement; and (f) avoid overlap between implementation responsibilities and follow-up program activities. More generally, the PCR recommends the establishment of a comprehensive facility management system, including a detailed inventory of schools.

32. This validation report concurs with the above recommendations, which are appropriate for designing future ADB operations. However, the PCR could also have recommended follow-up assistance or further actions by the Southeast Asia Department as follows: (a) making a comprehensive analysis of institutions, including their performance, to facilitate institutional

restructuring and capacity building in line with the Education Law (2007), and, on the basis of the analysis, empowering SSCs with adequate training and funds to assume responsibility for improving the physical and academic aspects of school improvement; (b) strengthening with TA support donor coordination and the annual operational planning process begun recently and agreeing on a fiscal framework that defines the share of each subsector (primary, lower secondary, secondary, nonformal, and higher education) and incorporating the framework in annual operation planning, for balanced subsector growth; and (c) monitoring (by ADB) the continued implementation of the program's policies to prevent policy reversal.

V. OTHER CONSIDERATIONS AND FOLLOW-UP

A. Monitoring and Evaluation Design, Implementation, and Utilization

33. Since the program envisaged the generation of information from the improved EMIS with the complementary benefit monitoring studies, including surveys, no overall M&E mechanism was designed. Monitoring the project component was entrusted to the Department of Materials and State Property of the MOEYS, which was responsible mainly for construction. The PCR points out that the program placed little emphasis on M&E. This validation report notes that (a) the EMIS was not improved to generate reliable data that would meet the M&E requirement of the program, and (b) the planned benefit monitoring and evaluation study was not completed. The PCR does not discuss the use of EMIS in monitoring the program. This validation report observes that the usefulness of the EMIS data to the program could be limited because of (a) the problem of data reliability (no validity testing was done), and (b) absence of integration of the EMIS with the management information systems in other departments of the MOEYS. Thus, this validation finds weaknesses in the design, implementation, and utilization of the M&E system for the program.

B. Comments on Project Completion Report Quality

34. The PCR is *satisfactory* as it is well written and concise, follows the PCR guidelines, and provides sufficient analysis using all available information. The PCR is also candid with respect to the weaknesses in the design and implementation of the program. It acknowledges the difficulty in assessing the program's effectiveness because of the incompleteness of data relating to some outcome indicators (student participation in grades 1–9 from the poorest quintile, access of non-urban areas to postsecondary education, and private sector participation in education).

C. Data Sources for Validation

35. This validation exercise used data from the government's PCR on the program loan, and ADB's report and recommendation of the President and PCR, program approval note, minutes of the staff review committee meeting, and reports of loan review missions, including the midterm review.

D. Recommendation for Independent Evaluation Department Follow-Up

36. As this program was covered by the 2009 Country Assistance Program Evaluation for Cambodia, a Program Performance Evaluation Report would not be needed.