Viet Nam: Second Upper Secondary Education Development Project
ABBREVIATIONS

ADB – Asian Development Bank
DMF – design and monitoring framework
EIRR – economic internal rate of return
GAP – gender action plan
M&E – monitoring and evaluation
MOET – Ministry of Education and Training
PCR – project completion report
RRP – report and recommendation of the President
USE – upper secondary education
USEDP – upper secondary education development project
USEDP II – second upper secondary education development project
USS – upper secondary school

NOTE

In this report, “$” refers to United States dollars.

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<th>Emmanuel Jimenez, Independent Evaluation Department (IED)</th>
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I. PROJECT DESCRIPTION

A. Rationale

1. Viet Nam’s economy had been growing at a rapid rate of more than 6% per annum from 2000 to 2010. To sustain such a pace, the economy needed to remain globally competitive, and the country required an adequate number of upper secondary school (USS) graduates with requisite competence. However, the quality of upper secondary graduates in Viet Nam was not comparable with that in other Association of Southeast Asian Nations members. \(^1\) Improvements in the quality of upper secondary education (USE) were expected to enhance graduates’...
employability as well as their chance to enter into tertiary education. The Asian Development Bank (ADB) is engaged in this endeavor in a phased manner through a series of projects.

2. The Second Upper Secondary Education Development Project (USEDP II or the project) (footnote 1) was a follow-up to the first Upper Secondary Education Development (USEDP) project in Viet Nam. The sequel mainly focused on two thrusts: (i) continue ongoing reforms in USE especially in relation to “upgrading of teaching and learning to international standards,” and (ii) improve the quality and access of USE in disadvantaged areas of the country (footnote 1). The project sought to improve the relevance and quality of upper secondary graduates, and to make USE more inclusive in the country, especially in relation to the four vulnerable groups, namely, the poor, ethnic minorities, women and girls, and persons with special needs. Furthermore, the project was expected to link-up and support other ongoing reforms in the secondary education under ADB’s Secondary Education Sector Development Program.

B. Expected Impact, Outcomes, and Outputs

3. The envisaged impact of the project was to improve employability of USS graduates, especially in the age cohort of 18–24 years. This reflected in the outcome of the project which focused on the improved readiness of USS graduates for vocational career development and tertiary education. The project’s expected outputs were: (i) enhanced quality of USE to international standards; (ii) increased access and retention of disadvantaged groups; (iii) strengthened planning and management; and (iv) project implementation, quality assurance, and monitoring.

C. Provision of Inputs

4. The project was approved on 31 October 2012 and became effective on 30 April 2013. As per the schedule, it closed on time on 30 June 2020. At appraisal, the project’s total costs were estimated at $105.0 million. Of this, $90.0 million was approved for financing by ADB through a loan from concessional ordinary capital resources. The remaining $15.0 million was to be provided by the government. Notably, the government’s financing share was slightly lower than the amount of taxes and duties financed under the project at $15.3 (footnote 1). At completion, the actual total cost of the project was $80.1 million (around 76.2% of the appraisal estimate). ADB’s loan at $65.5 million was underutilized at 72.7% of the approved amount. The main factors contributing to the lower utilization of financial resources included lower civil work costs, and drastically reduced expenditure on curricular and instruction materials. The proposals included in the project were prepared with the help of an ADB-supported technical assistance. No other technical assistance was involved during implementation.

5. At appraisal, it was envisaged that the project would require 471 person-months of total consulting services with 116 person-months international and 355 person-months national

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3 The subjects identified for quality upgrading were: "biology, chemistry, mathematics, physics, and social sciences" (footnote 1).

4 ADB. 2009. Report and Recommendation of the President to the Board of Directors: Proposed Loan to the Socialist Republic of Viet Nam for the Secondary Education Sector Development Program. Manila. The project supported 10 secondary education reforms actions on teacher and learning assessments, curriculum improvements, human resource management, information, and communication technology adoption, in addition to developing the secondary education master plan.

5 Project data table in the project completion report (PCR) shows nearly all the cost as foreign exchange cost which is misleading.
consultancy. At completion, the utilization of consulting services was 457 person-months (97 person-months international and 360 person-months national consultants).

6. The project was categorized as C for environment and involuntary resettlement, and B for indigenous peoples. No significant adverse impact on the environment was anticipated. The project design did not entail any land acquisition or relocation of people. It addressed education access and equity issues for poor ethnic minority communities in 33 target provinces with large ethnic minority populations. The key features of the ethnic group plan included: (i) targeted participation of ethnic teachers in training activities, (ii) introduction of ethnicity-sensitive curricula and instructional materials, (iii) inclusion of life skills-related training materials in the key ethnic minority social issues and vulnerability, (iv) undertaking civil works in ethnic minority areas, and (v) preparing guidelines for block grants to support local needs.

7. The project had a gender equity theme. It sought to address a number of gender-related reforms including (i) the lack of gender-sensitive teaching and learning materials, (ii) limited access of female teachers and staff to training opportunities, and (iii) limited awareness regarding the value of education for girls. A gender action plan (GAP) was included to implement these concerns. More specifically, the project aimed to: (i) promote female access to and completion of USE; (ii) ensure that 40% of participants in the in-service teacher training were female, likewise 55% of English teachers and 60% of teachers trained on life skills curricula were female; and (iii) construct separate toilets for female and male students. In addition, the project earmarked 20% of provincial block grants for addressing gender issues, and that gender criteria were included in school network mapping. Project monitoring and evaluation (M&E) reports included sex and ethnically disaggregated data (project completion report [PCR]) (footnote 6). During implementation, some gender-related activities (e.g., school networking and inclusion of gender and ethnic minority sensitive textbooks) were not implemented fully (detailed discussion in para. 23).

D. Implementation Arrangements

8. The project was implemented from 21 December 2012 to 30 June 2020. The Ministry of Education and Training (MOET) was the executing agency. The project was supervised and guided by an interministerial steering committee. Overall implementation was the responsibility of the Central Project Management Unit which was staffed by a full-time project manager, deputy project manager, and key technical staff. The approval of the nominated Central Project Management Unit staff by ADB was a loan effectiveness condition. Each of the project provinces (63) established provincial project management units to implement the project in their respective Department of Education and Training. In addition, some USS, teacher training universities, and the National Institute for Educational Management were among the other participating agencies.

9. Most loan covenants were complied with except for two which were partially complied with, and three for which compliance was delayed (footnote 6). The partially complied covenants related to (i) the timely development of a new curriculum due to the of a delay in MOET approval of the new curriculum by a year (footnote 6); and (ii) the target share of female teachers trained on life skills curricula for disadvantaged students (as a part of gender and development targets) was partially met (55.8% against a target of 60%). The covenant on inclusion of gender and ethnic group criteria in school network mapping was dropped. This was mainly caused by the cancellation of the planned procurement of a mapping software. Instead, MOET used its own information system. Three other covenants were complied with but with delays.

II. EVALUATION OF PERFORMANCE AND RATINGS

A. Relevance of Design and Formulation

10. The PCR rated the project relevant. It was consistent with ADB’s country development strategy and provided the much-needed financial resources for human development in accordance with Viet Nam’s Education Development Strategy, 2011–2020. The project also had important inclusive features supporting USE for the ethnic minorities, the poor, girls, and students with disability.

11. Delays in the new curriculum rollout led to the cancellation of some activities—the provision of textbooks and development of instruction materials. Although the delays in the new curriculum implementation was outside the project’s sphere of control, ADB should have properly identified the risk and adequately reflected it in project risk management. In addition to the delayed new curriculum, changes in government budget regulations also led to the cancellation of overseers training activities for academic staff (footnote 6). Another activity under the project, procurement of school mapping software, was also cancelled due to changes in MOET’s priorities.

12. During the midterm review, two outcome targets were proposed to be adjusted: (i) the increase in USS passing rates, which was observed to be lacking in project attribution; and (ii) the academic performance of gifted students, which had no baseline information, as the data required for assessments were incorrect or not readily available. Despite the recommendation, the two outcome targets were not deleted from the design and monitoring framework (DMF), which the PCR reported as “not measured.” This validation finds it rather unexpected. If certain indicators were viewed to be inappropriate, the solution should be to find better indicators instead of omitting them. Moreover, the project was a follow-on project, and normally this kind of repeat project would not be expected to have issues related to lack of information or data. As both executing agency and ADB had been engaged in the USE for more than a decade and the project design had a clear commitment to the M&E framework. One would have thought that involved agencies were already up to date on data and information and would have ensured these prerequisites, before launching the follow-on project.

13. In short, the validation views the project as having shortcomings in risk assessment and mitigation, and in the project monitoring (i.e., performance data not tracked). Nevertheless, the validation views the project’ support for inclusive USE, and its significance for graduate’s employability in Viet Nam to meet the need for maintaining its international competitiveness as important. On the balance, the validation assesses the project relevant.

B. Effectiveness in Achieving Project Outcomes and Outputs

14. The project has four outcome indicators: (i) passing rate of USS graduates in the national university entrance examination increases from 70% in 2011 to 80% in 2019, with 40% of those passing is female; (ii) the proportion of secondary school students receiving satisfactory or better score in the national achievement monitoring examination increases from 70% in 2011 to 85% in 2019; (iii) the increase in net enrollment rates for USE from 56.3% in 2010 to 60% in 2019;

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7 The RRP noted that the new curriculum would be developed and funded by the Viet Nam government, while the PCR noted that it was funded by some other development partners.

8 According to the new regulation, loan funds can no longer be used for study tours, training, or workshop activities.
and (iv) the academic performance of gifted students in 2018 improves by 10% over their 2013 performance. The PCR rated the project effective. It argued that the project exceeded targets in achieving two out of four outcome targets (indicators iii and iv), while two other targets could not be measured due to data limitations.

15. The validation notes that the project achieved the second outcome indicator. The proportion of secondary students receiving at least satisfactory mark in the national exam was 97.3% in 2018–2019, exceeding the outcome target of 85%. The PCR also reported the achievement of the third indicator. At project completion, 91.7% of secondary school-aged population was enrolled, higher than the targeted 60%. However, the PCR reported in the DMF that in 2009, the country has already had nearly 83.6% USE-aged population enrolled. This is much higher than the baseline data used in the original DMF, which was 56.3% in 2010. The discrepancy between the data used for appraisal and completion was not explained by the PCR.

16. The first and fourth outcome indicators were not reported and were not measured by the PCR. The increase in passing rates of USS graduates in the national university entrance examination, was seen to be lacking in project attribution. The academic performance of gifted students had no baseline information. This has been discussed earlier in relevance. Although the PCR reported that two outcome indicators were recommended to be taken out, since the two indicators were still included in the DMF, their achievements should still be reported and assessed. With that view, the validation considers the project to have only achieved half of its four intended outcomes.

17. Of the 20 output indicators, 13 were achieved (65%); 4 were achieved with delay, 2 were substantially achieved (including 1 with some delay), and 1 was not measured as there was no basis for assessment. During implementation, ADB approved the cancellation of activities that were either unachievable within the project timeframe or were superseded by changes in MOET’s priorities or its rules (footnote 6). The performance of each output is described below.

(i) **USE quality enhanced to international standards.** The output underscored the “relevance of USE to national goals” (footnote 6) and had seven indicators. Only one of them was achieved on time, four were achieved with delay, one more was substantially achieved but with delay, and one was not measured.

(ii) **Increased access to and retention of disadvantaged groups in USE.** This target had five indicators. PCR reported that all five were achieved, including the reduction in USS dropout rate in 10 provinces. Other achievements under this output included the provision of civil works; equipment and teaching aids; and teacher training especially for schools in disadvantaged areas, ethnic groups, or students with disability.

(iii) **Strengthened planning and management of USE.** The target had four indicators. PCR reported that three targets were achieved, and one was not measured.

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9 The PCR instead reported the passing rates of USS graduates in the national examination (not university entrance), which was 94.06% for the academic year 2018–2019 but did not report the baseline score.

10 The target not measured related to 63 continuing education centers to meet agreed standards for teacher qualifications, equipment, and instructional materials. These features were central to the qualitative improvement of USE (footnote 2). PCR reported that there was no basis to assess the target as there was no agreed standard for teacher qualifications, equipment, and instructional materials. Although the PCR noted this as a project design oversight (footnote 6), it did not say if any attempt was made for devising such a criterion, or why it could not be established.
substantially achieved, as only 46 from the target of 63 local governments (73%) received block grants (footnote 6). The PCR attributed the shortfall to the “coronavirus disease (COVID-19) pandemic.”

(iv) Project implementation, quality assurance, and monitoring supported. The target had four indicators and all the four were reported to have been achieved.

18. Safeguards and gender action plan. The project’s performance on safeguard issues on the environment, involuntary resettlement and indigenous people was assessed satisfactory. The project’s gender action plan (GAP) consisted of 18 actions and 11 targets. However, due to changes in the project activities and midterm revisions, there were some adjustments in the DMF indicators. At completion, 17 GAP actions (100%) were completed, and 13 of 15 targets (86.7%) were achieved. One performance target on the share of female passers among USS graduates in the national university entrance examinations was deemed inappropriate for lack of attribution to the project (footnote 6). The project made some significant inputs to address the issue of educational equity and access in vulnerable areas dominated by ethnic minorities, and thus supported inclusiveness for the poor, women, and girls. There were no major issues related to environmental sustainability under the project.

19. To assess the effectiveness of the project, it is important to note that the project assumed the new USE curriculum and textbooks would have been implemented during the project time. However, delays in the new curriculum rollout means that textbook provision and development of instruction materials were cancelled, while other project activities (mostly training of teachers) were carried out without the benefits of the new curriculum.¹¹ In short, the project has been implemented differently from the original design and intention. The PCR rightly pointed out that this had a notable impact on project performance (footnote 6). The project only achieved half of its intended outcomes. Most of the indicators under outputs 1 and 2 were reported to be achieved between 2017 and 2019, while the outcome indicators were reported using the 2018 and 2019 data. Hence, the contribution of the outputs to the achievement of the two outcome indicators was questionable. Moreover, some outputs and activities were canceled, making the casual link between outputs and outcomes less clear. Based on this explanation, the validation assesses the project less than effective.¹²

¹¹ The government’s PCR states that rollout was not expected until 2021.
¹² The Independent Evaluation Department (IED) and the Southeast Asia Department (SERD) have differing views on assessing effectiveness. SERD opined that the project should have not been assessed less than effective. The outcome indicators achieved by the project were critical enough to support the project’s intended outcome. Over 87% of total outcome and output indicators were achieved with minimal changes to the original project design. Deleted aspects of the original design are not considered major changes. The point that the project’s theory of change no longer holds is contentious. Moreover, safeguards and gender implementation were also assessed to be satisfactory with no complaints or adverse effects, and with positive impacts to USE and beneficiaries. Downgrading to a less than effective rating undermines this project’s important contributions to Viet Nam’s USE which has significantly improved standards, access and retention of disadvantaged students, USE planning and management, quality assurance, and monitoring. IED, for its part, reiterates that the validation’s assessment is consistent with the guidelines and downgraded the effectiveness, as explained in para. 19.
C. Efficiency of Resource Use

20. The PCR rated the project efficient. It argued that it was implemented within the budget and had significant savings. No economic internal rate of return (EIRR) was prepared at appraisal but upon completion, the EIRR was estimated at 16.4%.\(^\text{13}\)

21. Although the project was completed on schedule, the validation notes that the ADB loan was 72.3% utilized. Although lower civil work costs explained part of the savings, most of the savings in fact were cost underruns resulting from canceled activities. Cost underruns included the vital area of curriculum, textbook, and instructional materials, in which only 21% of the earmarked funds were utilized. In the validation’s view, these cost underruns indicate that the project was not able to deliver the output at the scale it intended, as such it did not utilize the resource efficiently.

22. Despite the cost underruns, in view of the EIRR, the validation assesses the project efficient.

D. Preliminary Assessment of Sustainability

23. The PCR rated the project likely sustainable. It argued that project benefits related to policy reforms and upgrading of standards for teachers and the USSs are likely to be sustained. The overall fiscal burden of the reforms is estimated to be low going forward. The MOET will continue to provide maintenance expenditure to schools for up-keeping of infrastructure. The PCR, however, provided no details on how the block grants were provided to the local governments, and how these are likely to impact the USE in their jurisdiction. This would affect the project benefits to vulnerable groups, especially the ethnic minorities, or those in the remote regions. Keeping in view the commitment of the Viet Nam government and its commitment to educational reforms, overall, the validation assesses the project as likely sustainable but with some downside risks to sustaining benefits for vulnerable groups that may need more attention.

III. OTHER PERFORMANCE ASSESSMENTS

A. Preliminary Assessment of Development Impact

24. The PCR assessed project's development impact satisfactory. It argued that students were having access to better quality education. Under the project school infrastructure, equipment and teacher standards had improved. Policy reforms had focused on the improvements in USSs, and MOET had undertaken measures to improve access and equity in USE. However, the PCR does not provide much data-based evidence to show that ADB support, not just improvements in the overall economic situation or other external factors, has contributed to the employability of the graduates. The DMF included some statistical notes indicating that the number of those completing USE or moving on to the tertiary education has nearly doubled between 2009 and 2019 but the expansion is geographically lopsided. Compared to the rural areas, the enrollment expanded more in the urban centers. The overall rate of unemployed USS graduates was low at project completion, but as compared to the urban areas, the incidence of unemployment is lower in the rural areas. However, the available impact data neither provided a gender breakdown, nor

\(^\text{13}\) The validation notes that the PCR’s EIRR methodology, although acceptable, is slightly different than the standard EIRR calculation in so far as the benefits are linked to the productivity differentials and cost savings through increased “internal efficiency” in USE, rather than being based on the wage premium data of USE graduates. The PCR does not compare Viet Nam’s situation with and without the project. As explained in para. 21, the cost savings that were calculated in the EIRR were mostly cost underruns resulted from canceled activities.
account for the share of ethnic minorities although the PCR noted that all reports included data with ethnic and gender breakdown. The PCR should have provided some evidence on how USE graduates are being prepared better for employment or tertiary education, or how USE is approaching international standards of excellence, as those are what the project intended to achieve. With this, the validation assesses the project’s development impact less than satisfactory.\textsuperscript{14}

**B. Performance of the Borrower and Executing Agency**

25. The PCR rated performance of the borrower and executing agency satisfactory. They met their implementation obligations on time; and MOET ensured timely, strong, and active support to the project. It regularly submitted reports to ADB on quarterly progress, implementation issues, safeguards monitoring, GAP implementation, and audited project financial statements. The executing agency indeed did well by closing the project on time. The validation, however, notes that MOET was not able to rollout new curriculum on time, consequently, affecting project performance. Similarly, it did not provide block grant support to all the targeted Department of Education and Trainings. By canceling the planned activities including the mapping software development and academic staff training activities without replacing them with the new ones, it missed the opportunity to utilize the available concessional loan funds in full. It should have been more active in generating and maintaining appropriate databases for monitoring related to USE, especially on key indicators. Overall, the validation assesses the borrower’s and executing agency’s performance as satisfactory.

**C. Performance of the Asian Development Bank and Cofinanciers**

26. There is no cofinancier for the project. The PCR rated the performance of ADB satisfactory. It noted the support ADB provided during project supervision including the number of missions and online interactions. The validation notes that ADB processed this project immediately after completion of USEDP, thus staying engaged in USE. The Viet Nam Resident Mission was responsible for project supervision for a number of years. It would have been good if the Viet Nam Resident Mission had succeeded in addressing the delay in rolling out the planned new curriculum, as this was central to the effort to improve USE. In retrospect, ADB should have reviewed the project performance indicators and revised them earlier. Nevertheless, the validation assesses ADB’s performance satisfactory.

\textsuperscript{14} IED and SERD have differing views on assessing development impact. SERD views that the PCR and subsequent explanations have adequately supported its satisfactory assessment. The proportion of secondary school students with "satisfactory" or better results in the national achievement monitoring examination increasing from 70% in 2011 to 97.3% in 2019 is significant evidence that USE graduates are more prepared for employment or tertiary education. It is self-explanatory that more USE graduates are prepared for tertiary education, and no additional explanation is required. In addition, only 2.05% population aged 15 and above are unemployed, indicating employment acceptability of a large majority. Establishment of regulations on professional standards for upper secondary school teachers, USE quality accreditation and national standards and the number of teachers and continuing education centers reached by the project in enhancing quality to meet international standards also cannot be discounted as clear evidence of improved USE standards. The PCR emphasized that the real impact on employability can best be measured in 2024, and that up to completion, positive development impacts are likely, with minimal to no negative impacts compared to project gains. IED, for its part, reiterates that the statistics presented mainly show how access to USE has somewhat improved, but not how ADB support, rather than improvements in the overall economic situation or other external factors, have contributed to the improvements. Moreover, minimal information was provided on “how USE graduates are being prepared better for employment or tertiary education, or how USE is approaching international standards of excellence.”
D. Others – Government’s Project Completion Report

27. MOET prepared a fairly detailed PCR and recorded the project activities as they evolved over the years (footnote 6). The government PCR assessed the project successful.

IV. OVERALL ASSESSMENT, LESSONS, AND RECOMMENDATIONS

A. Overall Assessment and Ratings

28. The PCR rated the project’s performance successful with the criteria ratings of relevant, effective, efficient, and likely sustainable. It assessed the development impact of the project satisfactory. The validation assesses the project successful with individual criteria ratings of relevant, less than effective, efficient, and likely sustainable. The main reason for downgrading the effectiveness rating is that the project outcomes and some critical outputs were not delivered satisfactorily or were not assessed properly due to lack of data and information. Project’s achievements were mainly in school infrastructure but were deficient or delayed in terms of curriculum, textbooks, and instruction materials.

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<td>Effectiveness</td>
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<td>Half of the outcomes were not achieved. Textbooks and instructional materials component were canceled. The project outputs missed critical targets and many of them were delayed.</td>
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<td>Preliminary Assessment of Impact</td>
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<td>Less than satisfactory</td>
<td>Rural areas benefited less from the project; no evidence on how USE graduates are more prepared for employment or tertiary education, or how USE is approaching international standards.</td>
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<td>Quality of PCR</td>
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ABD = Asian Development Bank, IED = Independent Evaluation Department, PCR = project completion report, USE = upper secondary education.
Source: ADB (IED).

B. Lessons

29. The PCR grouped its observations under lessons in three areas: (i) adjusting project design and targets, (ii) identifying good baseline data, and (iii) considering gender issues. Although the PCR narration is not rigorously formulated as lessons, the implicit emphasis is
recognized and supported. The PCR also makes a good suggestion for measuring the effectiveness of training programs (footnote 6).

30. The validation additionally suggests the following specific lessons:

(i) **Country level.** The project aimed to help improve the employability of the young labor force in Viet Nam. It is important that the government ensures that its policy and investment in USE linked clearly with demand for skills in the job market and business development in the economy.

(ii) **Program level.** The DMF missed some essential data that were important in measuring project effectiveness. As this was a follow-up project, both executing agency and ADB should have had up-to-date data and information. To avoid such issues, ADB needs to make a rigorous assessment of the institutional arrangements, and database benchmarks in the case of long-term commitments and preparation of additional follow-on projects.

(iii) **Results framework, risk management, and mitigation.** The main driver of the project was improving the quality of USE to enhance productivity and employability in Viet Nam’s growing economy. However, the revision of curriculum and instructional material preparation was not within the sphere of the project. Instead, the project assumed that curriculum revision and new instructional material will be introduced within the project time frame, but outside the project scope. ADB should have properly identified such a project risk and adequately reflected it in project risk management. ADB should have also ensured that the project outcome and output targets were within the control of the project to ensure achievement of its objectives.

C. **Recommendations for Follow-Up**

31. IED has no recommendations for post-project follow-up.

V. **OTHER CONSIDERATIONS AND FOLLOW-UP**

A. **Monitoring and Reporting**

32. The project’s report and recommendation of the President (RRP) had underscored the importance of M&E. MOET submitted various progress reports regularly. The PCR has pointed out a number of areas lacking appropriate data but did not indicate if the MOET had much flexibility in addressing the limitations. The validation considers the executing agency and ADB should have provided more attention on monitoring the project outcomes. Two key outcome indicators were considered not relevant to the project and was proposed to be dropped; however, no alternative or better indicators were introduced. The unexplained change in the way net enrollment rate (the third outcome indicator) is defined only when it came up during the PCR preparation. This was another indication of the lack of attention on outcome indicators which were not paid attention to during project implementation.

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

33. The PCR covers project description comprehensively and describes the complex and ambitious project with candor. However, it has some shortcomings. It does not spell out the reasons for the delay in rolling out of the new curriculum which was important for the project.
It provides a rather limited explanation on the assumptions in calculating the EIRR (footnote 6). The explanations provided for some project shortcomings (e.g., in assessing achievement of targeted project outcomes) are confusing or missing. Nevertheless, the validation assesses the overall quality of the PCR satisfactory.

C. Data Sources for Validation

34. Data sources used for this validation included the PCR, RRP, safeguards report, and the government’s PCR.

D. Recommendation for Independent Evaluation Department Follow-Up

35. IED may consider conducting a project performance evaluation report.

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15 The PCR also made a reference to the EIRR at appraisal, which was confusing at it was not included in the RRP.