

**RESPONSE OF INDEPENDENT EVALUATION DEPARTMENT TO THE COMMENTS OF
BANGLADESH RESIDENT MISSION ON PCR VALIDATION REPORT OF
LOAN 1881 OF BANGLADESH POST-LITERACY AND CONTINUING EDUCATION**

Date	BRM Comments	IED Response
9 July	<p>On less than likely sustainable assessment:</p> <p>The PVR has acknowledged the government's approval of a 5-year basic literacy program for an amount of around \$58 million in 2014 (2014–2019) and the targets and commitments outlined in the 7th FYP to sustain the PLCE programs. In addition, the Second Chance Education (SCE) initiated under PEDP3 in partnership with NGOs is continuing with the government financing. For the delivery of NFE/PLCE programs, the government has established district level offices with necessary manpower under MOPME's budget. These are permanent setups. This shows the government's commitment to the program. Hence, the project rating should be likely sustainable.</p>	<p>Only under the assumption that the basic literacy program and the PLCE program are the same in the 7th FYP would one infer that the project was sustainable. However, the "Project Description" in the RRP states, "The Project aims to establish an effective, community-based post-literacy and continuing education (PLCE) program for learners who have completed basic literacy courses." This implies that "basic literacy course" is a prerequisite for PLCE, and therefore, basic literacy program is not equivalent to PLCE. It is difficult to attribute the Government of Bangladesh's commitment to "basic literacy" to be for PLCE, without fundamentally revising the project's basic description.</p> <p>In addition, para. 20 of the PCR states the following in relation to the capacity of the involved organization: "By 2017, the MIS was not in use due to the demobilization of PIMU and turnover of BNFE staff." In other words, the "management information system" which is vital to the monitoring of PLCE activities at district and subdistrict levels is sitting idle after project closing. That (i) the administrative capacity (gained through the PLCE project) within BNFE has been lost due to staff turnover and (ii) the MIS is now defunct seem to support (IED's) fear that the PLCE program is no longer being sustained on the ground (or within BNFE).</p>
18 July	<p>On PLCE versus BLP:</p> <p>We confirm that both PLCE and basic literacy program (BLP) target the same population. In the PLCE RRP, the targeted people are "functionally illiterate," who "either missed the chance to attend school altogether or dropped out after a few years of school and remain functionally illiterate." BLP refers them as "illiterate people," who are identified through a baseline survey on their actual illiteracy (summary of project document attached).</p> <p>(a) PLCE</p> <ul style="list-style-type: none"> • Project Period: 2002-2013 • Target Learner: 1.20 million • Age Group: 11–45 years • Life skills training provided 	<p>Although the target description, age group and service provided are similar, the disparity between the target population size of the PLCE and BLP leads one to suspect PLCE to be only a minor subset of BLP.</p> <p>This was verified by the PEDP3 Revised Program Document (p. 57), where the NFE component took up only around 1% of the total PEDP3 budget, with a target of only 300,000 students (p. 82). These information add credence to the possibility that the PLCE project is not being sustained.</p>

Date	BRM Comments	IED Response
	(b) BLP <ul style="list-style-type: none"> • Project Period: 2014–Ongoing • Target Learner: 4.50 million • Age Group: 11–45 years • Life skills training provided 	
18 July	<p>On lack of MIS utilization and etc.:</p> <p>PCR has acknowledged this. However, the follow-on project Primary Education Development Programs (PEDPs) can use the management information system as needed.</p> <p>BNFE was established under PLCE. BNFE is responsible for covering the non-formal education programs in PEDP3, including the post-literacy. Government Program Document of PEDP3 is attached.</p> <p>Because of the space limit (15 pages for the PCR) all these attributes could not be included in the PCR. The approval of Non-formal Education Policy Framework (NFEPF) in 2005 was a necessary condition of the continuation of the PLCE project (formal government letter attached). As provided in the NFEPF, the government has established the Bureau of Non-Formal Education (BNFE) under revenue budget in April 2005, with District BNFE (DBNFE) offices in each district (organogram of BNFE in 2005 attached). Hence, PLCE has directly contributed to the establishment of BNFE including at the districts level, which is one reason supporting the sustainability of the project.</p>	<p>In the PEDP3 Revised Program document (p. 40), MOPME's Directorate of Primary Education (DPE) mentions "strengthening of the Education Management Information System (EMIS) through the establishment of a new IMD Division in DPE"—without any mention of the pre-existing MIS under PLCE.</p> <p>As mentioned above, the same PEDP3 document (p. 57) only attributes around 1% of the PEDP3's budget to SCE (which is expressly attributed to BNFE), and thus, BNFE cannot be seen as being responsible for more than a minor portion of PEDP3.</p> <p>Approval of the NFEPF and the establishment of BNFE are indeed significant outputs of the PLCE project. However, the questions remain on if these outputs have brought about sustainable outcomes and impacts on the NFE sector. Related documents from the government do not paint a very encouraging picture of the current state of BNFE, nor do they present any solid evidence on whether the DBNFE offices are being maintained or utilized effectively.</p>
9 July	<p>On less than satisfactory assessment of development impact:</p> <p>In the DMF, all three indicators for the Goal were achieved, and 7 out of 9 indicators for the Purpose were fully achieved and one partially achieved. One goal indicator was not achieved due to a very ambitious target of 90% employment or self-employment, lacked the baseline data. The project initiated the NFEPF that led to enactment of the NFE Act in 2014. The NFE Act brought the NFE Policy under a legal framework and provided an institutional guarantee for NFE. This establishment of legal framework is a long-term and far-reaching change that provides basis for all NFE initiatives. The project has achieved the development impacts that focused on long-term and far-reaching changes. Hence, the project</p>	<p>To claim that all three indicators for the goals to have been achieved would be difficult or impossible to verify with the information in the PCR. For indicator 1 (number of neo-literates living in poverty reduced), the number of graduates are presented without any linkage to whether their increase in income due to literacy has resulted in their income level crossing the poverty line. Indicators 2 and 3 were based off of the impact study conducted in 2012, which the PVR found highly susceptible to bias, and thus, not a reliable source of data. (para. 34)</p> <p>This was why, for the validation, it was necessary to refer to the outcome level to actual measurable data, which could give a clearer indication of the status of the outcomes, and</p>

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	development impact should be satisfactory.	<p>possible impacts. And as stated in para. 35, it was found that out of the nine indicators, four were quantifiable indicators—for which none of the original targets were met, and only one revised target was met.</p> <p>To sum it all up, as the actual performances of the “goal” indicators were not clear or objectively collected, while one-third of the “purpose” indicators clearly did not meet their targets, it is very difficult to justify assessing this project as “likely sustainable.”</p>
9 July	<p>One the efficiency of resource use:</p> <p>The PVR states the PCR’s “EIRR approximation assumes that the impact of the training on the beneficiaries would last beyond 2 decades”. This is not precise. EIRR calculation assumes that economic life of the project is assumed at 10 years after project completion.</p>	<p>In the column titled “Additional Wage of Trainees” in the PCR’s EIRR table, one could observe that the first batch trained in 2003 is assumed to earn additional wages starting in 2004 and to go on doing so until 2024. The validation finds the “additional wage” peaking in 2014 and staying as such for an additional 10 years to be overly optimistic, and suggests applying the 10-year lifespan of the effect of PLCE on the actual trainees (and taking them out of the additional wage calculation after 10 years). With such revision, the EIRR becomes more realistic as shown in the PVR.</p>
18 July	<p>On the validity of the impact study:</p> <p>Given that qualified professionals conducted the impact study with appropriate assumptions, we find PVR’s statement “the impact study conducted in 2012, which the PVR found highly susceptible to bias” as without basis. IED can verify with field visits to confirm as needed.</p> <p>On the evaluation criteria:</p> <p>As per IED’s Guidelines of the evaluation of Public Sector (2016), both quantitative and qualitative should be considered for the assessment of development impact. The PCR has done exactly that.</p>	<p>As stated in the PVR (para. 34), the impact study lacked clear indication of (i) the sample selection criteria, (ii) the impact evaluation design to be implemented by an independent evaluator, (iii) the definition of a counterfactual or control group, or (iv) the key indicator to be evaluated for impact. As such, it may be a valid study on the sample surveyed but cannot be taken as an objective or representative measure of impact upon the entire population of the project’s beneficiaries.</p> <p>The validation took into account all nine of the outcome level indicators (both quantitative and qualitative) and found that three of them did not meet the target—leading to the conclusion that the project did not deliver sufficient outcomes to drive further development impact.</p>
8 August	<p>On BLP and PEDP3:</p> <p>BLP is the main program after the PLCE to support nonformal education. The BLP has been fully financed by government since 2014 to support education and training of illiterate people. BLP has made the PLCE modality to continue and sustain, fully in line with the outputs of the PLCE. Currently, the PVR focuses its discussion on the NFE</p>	<p>In the PCR, a budgetary commitment by the government for BLP is mentioned as proof of sustainability, but not the actual share that’s going into NFE. The Primary Education Development Program III (PEDP3) was not mentioned by the PCR, but we took it into consideration to exhaust all resources to verify whether any significant achievements in</p>

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	component of PEDP3. But the PEDP3 mainly targets formal education.	sustainability was made. And all the documents that were shared to date only re-confirmed that NFE remains a very minor subset (~1%) of the government's larger push for improving basic education.
8 August	<p>On the sustainability criteria:</p> <p>Among the three key criteria for sustainability (para. 31 of the PVR), the sustainable policy environment and sustainable financing of PLCE are supported with clear evidences. These two achievements, together with the establishment of BNFE under PLCE, lay the solid ground for sustaining the education for illiterate people.</p>	<p>The three key criteria for sustainability in para. 31 of PVR were (i) establishment of NFE policy environment, (ii) provision of adequate infrastructure and financing, and (iii) strengthening of institutional capacity. The PVR also states clearly that only "(i) establishment of NFE policy environment" was achieved by the project, and that there were no evidence of the second and third criteria being met. "Establishment of BNFE" can only be seen as a direct result of the NFE policy environment, and without evidence of expansion in both budget and human resources within BNFE, it cannot be taken as proof of the latter two criteria.</p>
8 August	<p>On the basis of satisfactory development impact:</p> <p>The project has achieved six out of nine outcome indicators and educated and trained 1,100,000 people [out of the target 1,200,000] and delivered many positive achievements. This can be the basis of a satisfactory development impact.</p>	<p>Training 1.1 million people is no small feat, but it is still only an "activity" within the project. For development impact, evidence is needed to attribute impact (or even long-term outcome) on the beneficiaries well after the end of the project. The figures from the impact study (435,622 involved in income generation activities and 53.5% were women) are impressive results as well but would not stand against scrutiny of "cherry-picking" when the study itself is examined up close (para. 34). As such, there were no concrete evidence of development impact being achieved in the PCR (at the goal level). The outcome level indicators were taken into account as proxies to lack of evidence of development impact, and the fact that all of the original targets for the quantitative indicators (four out of nine) were not met raised serious doubts concerning development impact.</p> <p>These comments will be acknowledged in the PVR, however, the IED does not see the need for any additional revision to the PVR or the ratings within, based on the joint comments.</p>

BLP = Basic Literacy Program, BNFE = Bureau of Non-Formal Education, BRM = Bangladesh Resident Mission, DMF = design and monitoring framework, EIRR = economic internal rate of return, FYP = five-year plan, EMIS = education management information system, IED = Independent Evaluation Department, IMD = Information Management Division, NGO = nongovernment organization, MIS = management information system, MOPME = Ministry of Primary and Mass Education, NFE = nonformal education, NFEPPF = Non-formal Education Policy Framework, PCR = project completion report, PEDP3 = Third Primary Education Development Program, PIMU = Project Implementation Management Unit, PLCE = post-literacy and continuing education, PVR = project completion report validation report, RRP = report and recommendation of the President, SCE = second chance education.