ERITREA

EDUCATION SECTOR DEVELOPMENT PLAN (ESDP) 2013-17

EXTERNAL APPRAISAL

DRAFT REPORT - draft 1, Feb 28, 2013

(The draft report is in 2 sections: Part 1 presents the context with main findings and recommendations; Part 2 is the appraisal as per the GPE/IIEP Guidelines)

Part 1 Context, Findings and Recommendations

1. Context

1.1. The Ministry has developed an Education Sector Development Plan (ESDP), 2012-16, which is expected to provide the framework for future efforts in the ECD, primary, secondary and technical and vocational training sub-sectors.

1.2. The ESDP is being externally appraised for two purposes: a) to test its soundness as an adequate response to the challenges facing the sector and therefore an acceptable framework for all future national and external financing of the sector, and b) as a condition (one of a number) for submitting a Programme Proposal to the Global Partnership for Education (GPE) which has already made an indicative allocation of USD 25.3 million for a support programme of 3 years duration. UNICEF has been designated Management Entity (ME) for the GPE proposal on behalf of the Education Working Group (EWG) which is a forum representing the ministry, the main donor agencies and civic society organisations. As ME, UNICEF will be responsible for development and implementing the programme in close collaboration with the MoE.

1.3. The appraisal is being carried out by two consultants\(^1\), one international and one national. The terms of reference (tor) require the consultants to carry out the appraisal using the GPE/IIEP Guidelines for sector plan appraisals. The tor also requires the consultants to make recommendations with respect to making improvements (if needed) to the document. The appraisal is being carried out on behalf of the EWG who will decide whether to endorse the ESDP on the basis of the appraisal report.

\(^1\) The appraisal was carried out by Mr. Mike Kiernan, external consultant (desk appraisal) and Dr. Berhane Demoz, national consultant.
1.4. The MoE intends to make its submission to the GPE early March 2013 and thus the appraisal needs not only to be carried out before then but also approved/accepted by the EWG. This draft Summary document is the first output of the appraisal, based on a desk reading of the latest version of the ESDP. It is intended to inform the EWG of the initial findings so as to allow for its response and to identify any other specific issues the EWG might want addressed.

1.5. The final Appraisal Report will follow after comments on the draft by the EWG.

2. Main Findings

(note: The Appraisal team is aware that conditions in Eritrea are not the most conducive for normal education development and improvement. The ‘no war, no peace’ situation, the imposition of sanctions and their impact of the economy, the departure of major donors, not to mention the effects of droughts, the difficult terrain, remoteness of many areas, as well as lingering effects of the colonial era. – all these have serious consequences for society in general and for the education sector in particular. One could say that the situation is fragile and will continue to be so until normal conditions prevail.)

General Findings

2.1. The Ministry and its partners are to be congratulated for producing what is possibly the first sector plan for the sector (the ESIP of 2003 and the ESDP of 2005-09 were more programme documents than inclusive sector strategic plans). It will be of great help to the MoE to be guided by a strategic plan, as well as being instrumental in becoming a learning experience and a consultative process among the education community.

2.2. The ESDP demonstrates Eritrea’s commitment to the goals and objectives of the Millennium Development Goals (MDGs) and Education for All (EFA), based on the inalienable right of the child to an education capable of developing the full potential of the child. The National Education Policy of 2010 confirms these commitments.

2.3. The ESDP is ambitious in its vision, as befits a nation which has struggled for its independence over 30 years. The task of a strategic plan, however, is to take this vision and translate it first into priority programmes, based on an analysis of the options; and secondly into Annual Work Plans and Budgets within the current and expected human and financial capacities of the state.

2.4. It is equally important that while the vision for the sector is shared by the citizens of the nation, the strategic plan needs to be internalised by the main education stakeholders –
national and international – and this can only be achieved through the democratic processes of wide ranging consultations. The newly re-established EWG is an appropriate starting point for this process. It is reported that the ESDP was subject to considerable consultative processes – these need to be recorded and acknowledged in the ESDP

2.5. The ESDP\(^2\) is a promising start on the road to the full sector planning process, one which would include all tertiary institutions.

2.6. A sector plan is always a living document, adjusted to respond to crises but equally to new opportunities. Effective monitoring of the implementation processes will allow for adjustments to be made on an annual basis and these can be incorporated into approved annual work plans and budgets.

2.7. Thus it is important that the MoE has the appropriate institutional set-up to allow for the on-going development of the plan. It is planned to have a ESDP Steering Committee to oversee the implementation of the Plan. This committee would benefit from wider participation in order to enhance accountability and strengthen governance.

2.8. The restructuring of the Education Working Group (EWG) is a very positive step in the accountability and governance direction and a pro-active EWG can play a vital role in the on-going improvement of strategic plans and the more operation Annual Work Plans and Budgets.

2.9. There are a number of editorial errors, more of a cosmetic nature, (dates of documents), source of information, etc) but which need to be addressed in a final version.

**Specific Findings**

2.10. However, on closer examination, the ESDP shows up a considerable number of weaknesses. The main weaknesses are:

2.10.1. *The EPSP is not a comprehensive sector plan.* Tertiary level education also needs to be addressed even if under a different ministry. The secondary sub-sector cannot exist with the university sector providing adequate number of secondary teachers, especially in the necessary subject areas of the secondary curriculum. The university sector is also critical in carrying out research into the sector so as to provide the MoE with the tested evidence from the classroom, school and community. It is good to note, moreover, that ‘plans to expand higher education are underway’, though it is

\(^2\) The appraisal team used the Feb 13 version in the first instance; it was provided with a considerably improved version on February 28\(^{th}\).
worrying that this decision is from 2002 and no reference is made as to why no progress – apart from excellent progress at the Eritrean Institute of Technology and Teacher Education – appears to have been made since then. The ESDP fails to deal with the tertiary level education in general and the Colleges of Education in particular. This limits the ESDP in two ways. Primarily it does not address the tertiary level as institutions of education for their own sake, besides it does not deal with the part played by the tertiary level in serving all the literacy, general, continuing, and technical-vocational education. The tertiary levels are centres of education, research, and consultancy both vertically and horizontally for the school and education system. With special reference to the country, for example, the need to strengthen the capacity of the College of Education at Mainefhi and the ATEI (Asmara Teacher Education Institute) is mandatory.

2.10.2. The EDSP does indicate that it plans to strengthen its professional capacity. It intends to carry out a number of activities, which if supported, would make a significant contribution to the MoE’s ability to develop the sector.

2.10.3. The financial gap: Costs have been developed – both capital and recurrent – but reveal a financial gap of more than USD 100 million per annum. While it is anticipated that this will be reduced by a) increased government allocation (though the national budget allocation is not expected to exceed 8%), b) increased contributions from communities (many of which are very poor), c) private sector involvement (though there is no evidence of this yet and d) development partner increased contributions (anticipated GE funds are already assumed) – these are not very realistic. The choice for the MoE is then to prioritise further, designating certain activities as essential and others to be carried out when the economic situation improves.

2.10.4. Absence of a thorough risk analysis or vulnerability study. Eritrea is vulnerable on a number of counts, starting with the destruction of the system during the years of occupation. Eritrea’s road to recovery after its 30 year war of independence has been hampered by a number of adverse factors: environmental, social and geo-political. Later developments have also provided challenges which have required difficult responses. The consequences and impact of these factors on the education sector need to be explored and specific strategies developed to help alleviate the negative effects. Human capacity has been greatly impaired and country’s already limited financial sources are further constrained by security needs. A useful way of analysing
the impact is to use the emergency, reconstruction and development phase ‘lens’ and develop appropriate strategies for each of the conditions.

2.10.5. **Education Policy and Strategy**: Eritrea has a considerable number of education policy documents. References are made in the EDSP to ‘Our People, Our Future; (2001), the ‘Rapid Transformation of the Eritrean Education System’ (2002), ‘Government Macro Policy’ (2004), the ‘Poverty Strategy Paper’ (2003), and draft policies for ECD and inclusive education. Reference is made to a recent (undated) ‘road map for the development of the education in Eritrea’. Many of these documents are considerably dated by now (and many still in draft form only). (It would be useful to attach a bibliography to the ESDP listing all these key documents). The National Education Policy document of 2009 (NEP) presents the education context and the overall strategies and objectives for the sector. The Strategic Plan does not have to repeat these general goals but instead should focus on what can be achieved in the 4 years of the plan. Therefore the ESDP urgently needs an Action Plan section (or separate volume) which would spell out in detail what activities are to be carried out, what indicators will be used, what funds will be allocated and who will be responsible for implementation.

2.10.6. **Evaluation of Previous Experience**: with one major exception it is difficult to find any reference to evaluations of previous programmes. The exception is the Monitoring of Learning Achievement study of 2008 which reports serious problems in the only area which matters: student learning. This study and the data collected through EMIS provide a wealth of raw data which should lead to further research to identify the determining factors for the reported low levels of student performance.

2.10.7. **Plan design and priority**: The first component on equitable access is well developed satisfactory. However the two components on quality and capacity building are weak. The results of studies and evaluations on quality do not seem to have been taken on board.

2.10.8. **School management**: The critical role of school heads should be seen as the key to creating sound and quality environment for student achievement, teacher

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3 This is referred to as NE 2010 in the ESDP, another example of small inconsistencies throughout the document.

4 There may well be, but a) these were not provided to the external appraiser, b) not referred to in the section dealing with the preparation of the plan.
management, and school community interventions. This issue should be highlighted under capacity development.

2.10.9. The ESDP should include a chapter on the **process of plan development** which would refer to any formative/summative evaluations, studies, reports etc., carried out over the past 5-10 years and show how the recommendations have been incorporated into the new strategic plan.

2.10.10. **Intentionality vs strategic planning:** the overall tone of the document is strong on intention: ‘the ministry will, the ministry must’ etc., almost as if the strength of the wishes will guarantee success. For example, the document states that that the budget for classroom construction will increase from USD 34 mill in 2012 to almost USD 60 mill in 2015, but does not state how much was budgeted for classroom construction in 2011 and what % increase this would entail (as well as providing some indication of the source of the funds). Similarly, the Logical Framework annex, under Assumptions, states ‘Governments' commitment to expand education and willingness to provide financing for the construction fund’ as well as increased donor support. This needs to be grounded in concrete evidence and some indication of the willingness of the Ministry of Finance to increase funding of the sector.

2.10.11. **Missing essential pieces:** two essential diagrams/illustrations are needed: a) an overview of the structure of the education system from primary to higher education, indicating number of years for each stage, entry levels etc.; b) organograms of the MoE (at central, and Zoba levels).

2.10.12. **Capacity issues:** any plan succeeds or fails by its ability to be implemented. The implementation section of the document deals only with structures and not to the extent these are sufficiently staffed both with respect to number and qualified personnel. No mention has been made of any capacity analysis (and this would be an essential component of a final plan). The current modest capacity of the MoE at national, regional, and sub-regional levels should be developed at the early stages of the ESDP. The plan is still ambitious and requires rigorous capacity development initiatives. This should include the management of financial and procurement skills.

2.10.13. **Monitoring and Evaluation:** this section is weak and it is not sufficient to use the Logical Framework as the main monitoring instrument as it does not include specific targets and indicators.
2.10.14. **Capacity development**: the main focus is on capacity at central level. The role of the Zobas or the regional education offices should be seen as critical and the MoE should focus on capacity development and monitoring of the ESDP at Zoba and sub-Zoba levels. This is also key to ownership, responsibility, accountability, and quality implementation.

2.10.15. **Consultative process**: The preparation of the ESDP seems to have been at its early stages in the country and thus seems to have gone through a limited consultative process. The process of consultation should be highly strengthened.

2.10.16. **Role of the private sector**: it is not clear what this role is and/or could be. By providing incentives to the private sector it is possible that, as the private sector usually focuses on urban areas, this would allow the MoE concentrate on disadvantaged areas.

### 3. ESDP Recommendations

3.1. These are made with certain reservation as time did not allow for discussions with the relevant ESDP stakeholders. It is easy to make recommendations from the comparative ‘safety’ of a desk appraisal, without experiencing the actual situation ‘on the ground’.

3.2. Nevertheless, the ESDP can be appraised in the light of ‘best practice’, in particular comparing sector plans of countries in the region and especially countries who have become recent members of the GPE.

3.3. The main recommendation of the appraisal team is to see the ESDP as a promising start to the overall process of full sector strategic planning. Therefore the appraisal team proposes that the document be accepted as *Work in Progress* and be regarded as the first step in the development of a comprehensive strategic plan (including, for all third level education institutions). Such a comprehensive plan would also include detailed Action Plans (with clear and realistic targets and allocated budgets) and could be approved at the highest levels of government (the Cabinet?) by 2015. It would also be based on a comprehensive sector analysis which would provide options to be considered by the education community of Eritrea.

3.4. The ESP has the virtue of focusing on three main objective clusters: increasing access/equity, quality improvement and Institutional capacity building. However, given the considerable constraints affecting the sector it would be good to carry out a further
prioritisation exercise, indicating activities as either A (highest priority), B (medium) and C (lowest). This would help towards more realistic programming.

4. Conclusion

The Appraisal Team:

- **Recommends to EWG that the ESDP be endorsed as the framework for future national and external support to the sector.**

- Considers the ESDP 2012-16 to be a good foundation and start to the process of developing a comprehensive sector plan. It is particularly strong on basic education. As such, the ESDP is considered a Working Document, a ‘living’ document to be adjusted on the basis of better field evidence and budgetary commitments from government and development partners.

- Work should continue on the plan so that the higher education sector is improved, a Results framework developed and that a realistic plan is developed and approved by the MoE/EWG for the development of the full sector plan within the next 3 years, culminating in the endorsement of the plan by the highest national authority. The EWG could use the GPE/IIEP Plan Preparation Guidelines as a reference. In addition the appraisal teams strongly recommends that an Education Planning Support Strategy be discussed with the MoE, with the aim of strengthening the MoE’s planning capacity (at central, regional, district and Zoba levels). Clearly identified technical assistance would be a key part of this strategy.

- The appraisal team does not want to delay the implementation of a GPE support programme which is urgently needed to address critical problems in the sector. The team is both aware and appreciative of the difficult challenges facing the sector and supports the efforts of the EWG to access funds as quickly as possible both to maintain and expand current efforts in basic education. While Eritrea’s commitment to the goals and objectives of EFA is not doubted, its ability to achieve these goals is seriously undermined by human and financial capacity gaps. GPE support will be a positive step towards addressing these constraints, and in any event, factors outside of the education sector *per se* will determine to a large extent the development of all sectors in Eritrea.
Part 2  ESDP Appraisal (GPE/IIEP Guidelines)\textsuperscript{5}

There are 3 main aspects of the Plan which have to be considered:

1. **Appraising the development process of the plan**
   - 1.1. The preparation process
   - 1.2. Stakeholder engagement

2. **Appraising the plan itself**
   - 2.1. The sector analysis
   - 2.2. The Plan design

3. **Appraising Plan implementation and plan readiness**
   - 3.1. System capacity
   - 3.2. Governance and accountability
   - 3.3. Risks to Implementation and the mitigation of such risks.

4. **Summary (matrix) of the Appraisal**

1. **Appraising the development process of the plan**

   1.1 **The preparation process**

   The development of the plan seems to have three main drivers: a) national development policies, b) education sector policies and c) analytic information provide through EMIS. The National Education Policy (NEP) document of 2009 seems to be the foundation of the ESDP and more reference should be made to this in the ESDP. Indeed, the ESDP repeats a lot of the content of the NEP; the ESDP should focus exclusively on strategy, strategic options, priorities and activity plans.

   The main problems that the various policies are either only still at draft stage and/or are somewhat outdated. References are made to policy documents from 1994 and there are very few recent documents reported. A good bibliography would be welcome.

   It does not appear that a full sector analysis was carried out prior to the start of the planning process. A full and inclusive sector analysis is the foundation of a sector strategy. In addition, an education public expenditure review (PER) is also a useful instrument especially in constrained economic situations.

\textsuperscript{5} It should be recognised that the appraisal guidelines reflect the structure of the GPE/IIEP Plan Preparation Guidelines which were most likely not available to the MoE during the preparation period of the ESDP. Nevertheless, the appraisal guidelines address generic issues of any appraisal methodology.
The document does not, and should, provide the reader with some idea of how the plan came into being, what consultative processes were adopted, what kind of plan management team was set in place, approval levels, etc. This is an easy task: the inclusion of a Preface would suffice.

The preparation process is however guided by a seeming well functioning EMIS system as all the school data is derived from the document ‘Eritrea: Essential Indicators, 2010/11. The data is presented in Chapter II which is entitled ‘Institutional Context’. It might be better to call this chapter Sector Analysis or Situation Analysis as it does give a good picture of enrolment levels, drop outs and transition rates. Organisationally, it might be considered to assemble the data using the 3 priority areas as sub-headings for this chapter.

It might also be useful to separate the ‘challenges’ part of chapter 2 and have a separate chapter entitled ‘Strategic Options’ because in this chapter you are considering how to respond to the situation as outlined in situation analysis. Strategic options look address issues such as multi-grade teaching, streamlining curricula, better time-on-task, school clustering – trying to find ‘local solutions to local problems’. This chapter should explore the findings from the considerable number of studies reported on page 13 of the document:

- Reviewing the National Education for All (EFA) Framework for Action;
- Study on the ‘Management of Teachers’;
- Study on ‘The Causes of Repetition and Dropout Rates in Secondary Schools’;
- Study on the impact of financial incentives on girls’ enrolment, retention and performance;
- National Literacy Survey;
- Preliminary study on the causes of enrolment decline in elementary schools;
- A curriculum impact study;
- Effectiveness of mother tongue education;
- Application of learner-centered and interactive pedagogy;
- Alignment of curriculum and national examination;
- Alignment of educational level Expected Learning Outcome (ELO) with Eritrea National Qualification Framework (ENQF);
- Pilot studies on the different textbooks under trial;
- Follow-up studies of 1,800 former ATEI graduates;
- Sub-sector studies on ‘Eritrea Sub-Sector Review-Technical-Vocational Education and Training’ and Adult Education.

For example, the study on financial incentives shows that comparative small amounts of grants have a very positive impact on girls’ enrolment and retention – if so, the option of expanding this programme should be assessed and if feasible, become a major strategy to achieve the ministry’s equity goals.

1.2 Stakeholder engagement

The re-establishment of the EWG was probably too late for any meaningful engagement by the EWG in the preparation processes of the ESDP. However, the fact that the EWG has commissioned the appraisal of the Plan augers well for future engagement. Partners must realise that the EWG is only
as effective as the sum total of efforts from all members and therefore the necessity for real engagement. In a number of countries, EWGs fail because they are seen only as information sharing meetings and not for effective policy dialogue. Eritrea does not have a large number of donors and civic society is not as well organised as might be expected; thus there is considerable onus on the current EWG to provide a forum for meaningful policy dialogue.

The government’s stated intention to adhere to the principles of the Accra Declaration on Aid Effectiveness is to be particularly welcomed in this regard as it allows all stakeholders to engage in meaningful dialogue on key sectoral issues.

In the monitoring and evaluation chapter the ESDP indicates that a Joint Annual Review process will be initiated as well as a Mid-term Review of the plan. These are very positive steps.

2 Appraising the plan itself

2.1 The sector analysis

It is not clear whether a full sector analysis has been carried out. However, the good data collected by EMIS provides an excellent input to the carrying out of a sector analysis and a number of studies are quoted but it is not clear how these have affected strategic choices. The focus moreover seems to be on drop out and repletion rates in basic education. There is little analysis of student achievement: e.g. of examination results, or any student assessments, etc. It is good to read in the document that the MoE will seek to become a member of SACMEQ but it should also consider setting up a national assessment system. The analysis could be enriched by the field and desk surveys conducted by the MoE staff in February 2013. These include the very enlightening issues and suggestions that emerged based on the 10-12 surveys in the broad consultative workshop in late February 2013. Two examples are noted: the construction of appropriate classrooms in remote areas and the feasibility of multi-grade teaching in relevant schools with low enrolment.

2.2 The Plan design

Strategic options are not explored. While recognition is given to the concept of demand side factors the design as a whole is very supply side oriented. In addition the design is more intentional than strategic. While the intentions are laudable – more children in school, better quality etc. – is not clear what strategic thinking was carried out, what trade-offs were considered, etc., the latter being very important in a human/financial capacity-constrained situation.

One of the strategies is on ‘Girls’ and Women’s Education’ and the activities outlined are solid and necessary. However this sub-component does not feature in the following chapter (chapter 5, Specific Objectives, Targets and activities.)
In chapter 5, strategies and activities are linked together; it would be good to distinguish between a strategy and an activity. Here the link with the MoE’s own Annual Work Plan and Budget strategy would be very useful. Also it will be necessary to integrate the EMIS indicators into this section. The EWG should consider having a supplementary volume to the ESDP dealing solely with Action Plans, with a detailed plan for year 1 of the plan period.

3 Appraising Plan implementation and plan readiness

3.1 System capacity

The last 3 chapters of the ESDP are the weakest. The implementation chapter looks very generally at the roles of the ministry (as ‘retaining responsibility for the management of the entire implementation process of the plan’), the steering committee and MoE departments, Divisions and Units. There is no evidence of capacity gaps in terms of numbers (established posts) and qualifications (professional and technical). While the EDSP states that the plan may need to be modified and that the Annual Work Plan and Budget will take experience into account, there is, for example, no evidence provided of the effectiveness of the AWPB – how much of the AWPB of 2010/11 was completed satisfactorily? How much of the planned budget was actually made available by the ministry of Finance. How many activities were affected by low capacity levels?

The financial capacity is also poorly analysed. There is no indication of the recurrent budget and as mentioned before it is difficult to assess the feasibility of the plan for the development budget of almost 500 mill USD if current levels of development budget allocations (including external funding) are not known.

3.2 Governance and accountability

Mention is made of the policy of decentralisation, - indeed decentralising down to school and community levels – but there is no assessment of current governance and accountability practices. A major accountability instrument is the presence of an efficient and effective Audit System – both internal and external. It is not known if there is a parliamentary sub-committee on education (or on social services) which can, if functioning properly, provide oversight – and indeed support – for the ministry. A full sector study, such as proposed in this Appraisal, would be able to look more thoroughly at this issue.

However, the planned Joint Annual Review Meetings (JARM) and the planned EDSP Mid-term Review of the plan are promising initiatives. In addition the MoE plans to have a final evaluation of the ESDP and it is important that this is a joint exercise involving all education stakeholders.
Becoming a member of the GPE ‘family’ will also provide the MoE with the support of fellow members and enable the MoE share in the collective experience of the GPE member states.

3.3 Risks to Implementation and the mitigation of such risks.

Risks are mentioned throughout the document in a general way but a specific Risk Analysis has not been carried out. Given the precariousness of the situation in Eritrea today, it is strongly advised that a Vulnerability study be carried out. Again, the intention of the ministry to address implementation barriers is admirable but this intention must be followed up by a full-scale vulnerability study which would specify the scope and scale of risks and vulnerabilities.

**APPRAISAL: FINAL WORD**

The Appraisal Team deems the ESDP 2013-17 to be an acceptable framework for national and external support to the education sector.

Considerable work has been carried out in the preparation of the strategic plan and all involved must be congratulated.

The team therefore recommends to the Education Working Group that the ESDP meets the requirements as a partial condition for submitting a 3 year Support Programme to the Secretariat of the Global Partnership for Education.
### SUMMARY OF THE APPRAISAL

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<th>Very satisfactory</th>
<th>Satisfactory</th>
<th>Room for improvement</th>
<th>Comments</th>
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<tr>
<td><strong>Education Plan</strong></td>
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<td>Development process</td>
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<td>Preparation process</td>
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<td>Can easily be described in final version of EDSP</td>
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<tr>
<td>Stakeholder engagement</td>
<td></td>
<td>✓</td>
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<td>EWG a good beginning but will need dynamic leadership and partner commitment</td>
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<td><strong>Education Plan</strong></td>
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<td>Education sector analysis</td>
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<td>✓</td>
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<td>There is a need for a comprehensive sector study</td>
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<td>Policy Priorities</td>
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<td>✓</td>
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<td>Management should be stressed; capacity is compromised without effective management structures</td>
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<tr>
<td>Programme design and prioritisation of strategies</td>
<td>✓</td>
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<td>There is a need for a Results Framework and the establishing of reasonable targets against base year data</td>
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<td>Plan design</td>
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<td>While development and recurrent costs are calculated, the overall budget seems very unrealistic</td>
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<td>Monitoring and evaluation</td>
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<td>✓</td>
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<td>Needs more detail but good conceptually</td>
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<tr>
<td>Development and financing of an Action Plan</td>
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<td>Possibly the weakest part of the plan. It is suggested that a separate volume addresses this key area.</td>
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<td><strong>Appraisal of Implementation Readiness</strong></td>
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<td>System Capacity</td>
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<td>Since a capacity study has not been carried out it is difficult to assess this aspect. There is anecdotal evidence of a serious crisis.</td>
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<td>Governance and accountability</td>
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<td>The <strong>intention</strong> to create governance and accountability systems; but not clear how they will be implemented</td>
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<td>Risks to implementation and mitigation strategies</td>
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<td>Again, the intention is clear but there is an urgent need to carry out a Vulnerability Study and to include Crisis Prevention and Mitigation strategies into the overall plan.</td>
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