

Evaluation of Programmatic Approaches in the GEF

AUDIT TRAIL

Stakeholder comments on the draft report circulated on April 10, 2017

May 5, 2017

Author	Conclusion, Recommendation or Paragraph	Topic / Paragraph Title	Comment	Reply and actions taken
World Bank		General Comments	One of the main objectives of this evaluation was to contribute to the further development of GEF programs in the “context of the GEF’s strategic move towards multifocal and integrated solutions to environmental challenges proposed in the GEF 2020 Strategy” (Evaluation Approach Paper). With this in mind, in our opinion the evaluation missed the opportunity to take a critical look at the structure of programs, addressing the following questions: Why do agencies and countries develop programs in the first place? Why is the GEF limiting the design of programs to one replenishment period which undermines expectations of long term impact? Do programs crowd-in investments, including from private sector clients?	No action taken. The objectives of this evaluation are clearly spelled at paragraph 31 of the Approach Paper. The text cited in the comment is introductory and descriptive. While interesting, the questions suggested are out of the scope of this evaluation, but could be considered for future studies.
World Bank		General Comments	Analysis and Findings – a number of statements and broad generalizations derive from an analysis of select four programs case studies and appear therefore fairly arbitrary. A different cohort of programs might have led to a very different picture, and we recommend that these statements and findings be caveated accordingly.	No action taken. A rigorous methodology based on program maturity has been designed and applied to the selection of programs for case study. See Annex 2 – Methods and Tools, Appendix 2 for case study selection.

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World Bank	General Comments		The selection criteria for these case studies is not clearly defined and it is not obvious why these 4 programs were selected. The Bank had provided a long list of possible programs that could have been evaluated and would have indicated much stronger results than the one selected by the IEO.	No action taken. See comment above, and refer to Annex 2 – Methods and Tools, Appendix 2
World Bank	General Comments		Some charts are missing legend (for example figure 1, page 11). there are 8 findings (A –H), not 7. There is a numbering error	Action taken: these charts have been edited and numbering has been corrected.
World Bank	General Comments	Conclusions and Recommendations	It would be useful to align the findings, conclusion and recommendations in the same order of discussion. This would strengthen the narrative such that findings should define conclusions and result in recommendations.	No action taken. While findings follow the order of the evaluation questions laid out in the approach paper, the conclusions (evaluative judgments) and recommendations do not have to follow the same order. Conclusions tell the ‘story’ emerged from the analysis, so it has to be coherent in itself. Recommendations logically follow the conclusions, but do not necessarily apply to each conclusion.
			Conclusion 1 could be better phrased – it is not clear what “better design” implies? Clarify what broader /larger scale results mean for PAs?	No action taken. It implies choosing where it is appropriate to go multi- rather than single agency, country and or focal area. The choice would be based on the specificities of the case. IEO is not supposed to be prescriptive in its recommendations.
			While the text somewhat captures the point, it may be important to emphasize in Recommendation 2, the need for flexibility both in design and scope of programmatic approaches to ensure that these do not become prescriptive	No action taken. The evaluation is not making a call on what programs should cover and how. This is up to decision

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				makers and implementers. See our reply to the previous comments.
World Bank	General Comments	Editorial and formatting	Readability would be improved if the extensive analysis in Chapter III could be arranged as an annex, leaving only findings and recommendations in the main text.	No action taken. Annexes and technical documents are already quite dense and detailed. The main report needs the supporting evidence to substantiate the findings, conclusions and recommendations.
World Bank	General Comments	Analysis and Findings	A number of statements and broad generalizations derive from an analysis of select four programs case studies and appear therefore fairly arbitrary. A different cohort of programs might have led to a very different picture, and we recommend that these statements and findings be caveated accordingly.	No action taken. The selection of programs for case studies is rigorous and representative, and explained in Annex 2 – Appendix 2 (see replies to previous comments above).
World Bank	General Comments	Analysis in Chapter III	What statistical significance can we attach to the samples? Is the sample size sufficient for the analysis and conclusions?	No action taken. Every time the qualifier ‘significant’ is used in the report it means statistically significant. The four complexity factors affect the project outcome ratings at a 95% confidence level. the geospatial analysis section and the related technical document clearly define the levels of statistical significance tested in the analysis.
World Bank	Figure. 7	Findings. Programmatic projects compared with stand-alone projects	It seems questionable that access to set-aside funds should be a disincentive to join a program	No action taken. The way the survey is designed is such that the same question is asked both in positive and negative sense, to check for validity.
World Bank	Para. 27	Context. GEF versus Comparable Donor-based Programs:	We disagree with this statement - in our opinion it would be possible to design programs with a longer term framework spanning more than one replenishment cycle, given the track	No action taken. The difference is in the legal/institutional dimension: the

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		Similarities and Differences	record of the GEF being regularly replenished over the last 25 years	new replenishment funding cannot be taken for granted legally.
World Bank	Para. 31	Findings. Programmatic projects compared with stand-alone projects	First sentence refers to the link between complexity of the programs design and implementation –we recommend to remove this and some other self-evident statements in the report	No action taken. The sentence is descriptive and interpretative of the data presented in Figure 2.
World Bank	Para. 32	Findings. Programmatic projects compared with stand-alone projects	Transaction costs are higher in the programs – In our view this is not “perceived” to be higher as it is suggested in the report, but rather a factual statement	No action taken. These are perceptions from the survey, not hard data. These are reported and used in the analysis as such. Section F on cost effectiveness, efficiency and coordination deal extensively with this issue.
World Bank	Para. 41	Findings. Programmatic projects compared with stand-alone projects	Findings are based on statistically non-significant sample (para 41 findings are based on the 4 case studies).	No action taken. Paragraph 41 used case studies data and information to deep-dive from the findings presented in the previous paragraphs, presenting statistically significant data analysis of APR and geospatial child project cohorts. The discussion here presents examples of demonstrated trends form portfolio and geospatial analysis.
World Bank	Para. 43	Findings. Broader and Longer-term Programmatic Results	One of the key findings of this report on the level of adoption of the GEF programs appears to be based only on interviews with stakeholders and is not verified by other evaluative methods and analysis. Please clarify or revise with supporting evidence	No action taken. Supporting evidence on broader adoption is found in para 44 and on, based on desk analysis of terminal evaluations using the broader adoption analysis framework described, not interviews.

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World Bank	Para. 50	Findings. Broader and Longer-term Programmatic Results	“The most prominent factor impacting outcomes is strong national ownership, promoted by good engagement with, and support of, key stakeholders such as national governments, civil society organizations and the private sector”. According to this statement seems like GEF agencies do not play any role in achieving project outcomes – is that true? Please clarify or rephrase to reflect the finding better	No action taken. GEF Agencies do play a role in achieving outcomes of course. However, in the cohort of terminal evaluations analyzed for broader adoption, ownership emerged as the most prominent contributing factor.
World Bank	Finding 4.	Findings. Ownership	Several statements in the report are made without analysis of the different stakeholders’ role in achieving certain outcomes, and therefore lack context.	No action taken. Finding 4 reports on program ownership from different quantitative and qualitative data sources, and is about relevance, not effectiveness analysis.
			“...GEF Programs have progressively shifted over time from a country to a multi-country focus” - this shift happened as a result of lack of support from Council members for single-country focused programs;	No action taken. Thanks for adding some context to an observed fact. It does not change the finding though.
World Bank	Box. 7	Findings. Ownership	Statement “In contrast to States participating in the national project in India, MENA-DELP participating countries have only a modest degree of ownership of the program.” This statement contradicts text in the same paragraph “In the case of Jordan, for example, the Badia project was already designed as part of a much larger Government program” – one would think that including GEF operations as part of “larger government programs” is a good thing, and a sign of country ownership in and by itself. Whether individual country projects had a strong feeling of “belonging” to a Program is different, and largely due to limited support available for program coordination allowed by the GEF Secretariat at that time. Please revisit.	No action taken. The discussion in Box 7 is not on whether country projects feel a strong sense of belonging to a program or not. What we are saying here is that country ownership is at project level, not at program level.
World Bank	Table 3.	Findings. Cost-effectiveness, Efficiency and Coordination issues	Information in Table 3 need to be corrected – posting period is 4 weeks (not 3 or 4 weeks); stand-alone projects are normally not circulated for Council comments prior to endorsement.	Action taken: Edited as indicated in the comment.

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World Bank	Para. 72	Findings. Cost-effectiveness, Efficiency and Coordination issues	Statement “child projects have been delayed as GEF agencies waited for all the child projects to be ready for CEO endorsement.” – This seems a very unlikely scenario and somewhat incorrect in our view, and not the way the Bank would normally implement multi-country programs – our experience is that in the case of the GEF-6 IAPs in particular, it was the GEF Secretariat requiring all child projects be endorsed at the same time	No action taken. The statement is about reports from interviewees talking of specific cases, including the MENA-DELP. We acknowledge the useful information provided on how IAPs child projects endorsements have been done, and will look into this issue more in-depth in the ongoing IAP reviews.
World Bank	Para. 74	Findings. Cost-effectiveness, Efficiency and Coordination issues	Statement “Co-financing either comes from government or from GEF Agencies as grants or concessional lending by MDBs” and following Figure 25 – is it possible to show MDB data as a subset – given leveraging should be a desirable outcome, and one where MDBs have a comparative advantage? Not all GEF agencies have the same roles and comparative advantages in the partnership. This also would provide a better understanding of the differences in leveraging potential of GEF agencies and, how they impact the overall outcomes	No action taken. There is no way to decipher this without looking back and individual child project documents. The paragraph and the figure reports the MDB data as a whole (inclusive of grants and lending).
World Bank	Para. 77	Findings. Cost-effectiveness, Efficiency and Coordination issues	Statement “...Only eight of them have a dedicated coordination budget allocated from the program itself” – would be helpful to provide information on which programs and findings on why only selected programs had allocated budget for project coordination. Likely these are more recent projects, when GEFSEC started providing support to this approach.	No action taken. Correct. The narrative already indicates an increasing acknowledgment of coordination costs in recent programs.
World Bank	Para. 78	Findings. Cost-effectiveness, Efficiency and Coordination issues	Statement “This counteracts one of the original expectations of programs, namely that they would lead to decreased management costs.” It is hard to understand how anyone would have expected that in the complex multi-agency multi-country project management cost could have decreased management cost. On the other hand, in our view seeking to reduce transaction costs through bundling of projects with related objectives and/or regional scope is a valid justification	No action taken. That’s exactly the point the evaluation makes. GEF Council documents refer to management costs saving that would arise from programmatic approaches. Our evidence points to the contrary.

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			for a program approach, though not the only or the main one. This issue should be better emphasized in both the conclusions and recommendations.	Conclusions and recommendation already cover this issue.
World Bank	Para. 81	Findings. Cost-effectiveness, Efficiency and Coordination issues	Statement “For such large-scale programs, the GEF Secretariat often initially takes a long time to sort out the governance structures. It may meet all the Agency stakeholders several times, which has been shown to avoid management issues down the line.” This statement reads like an evaluative finding, while it is an arbitrary stakeholder opinion. Please reflect it as an opinion.	No action taken. It is a fact emerged from data gathered through interviews triangulated with document review. For example, the high frequency of reported meetings on formulation of GEF-6 programs including the IAPs.
World Bank	Para. 82	Findings. Cost-effectiveness, Efficiency and Coordination issues	Statement “For example, one NGO implementing partner in the MENA-DELP program reported considerable confusion over how its engagement would work. It initially believed that it would have a direct funding link to the World Bank to implement the activities outlined in its proposal to participate.” The phrasing of this para is unclear in the context of country level challenges of PAs, without the appropriate background. Also what does the “direct funding link” refer to mean? In general, fund flow mechanisms and execution arrangements in projects are extensively discussed with government counterparts based on their proposed approaches and practices. Moreover, this seems one poor example from which it is clearly impossible to derive any lesson – without further context there could be so many explanations for such “confusion”, hardly related to whether the project was part of a program or not.	No action taken. The details of this example are found in TD4. At the time of project start, executors weren’t aware of whether the project of which they executed one component was part of a larger program. They also weren’t aware of the other project components. The direct funding link misunderstanding is just an example. The point is about the lack of communication between the project management, Government and executors, which demonstrates a lost opportunity to fully exploit the value added of a program over a set of projects. This confusion could have been easily avoided.
World Bank	Para. 87	Findings. Cost-effectiveness, Efficiency and Coordination issues	Box 10. example of DELP mentioned absence of the regional coordination budget, while statement in para 87 contradicts this information	No action taken. We indicate the budget covers management cost, M&E and KM, not coordination.

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			“...for programs M&E are so small that there will be little credible information for knowledge sharing” – Please clarify.	No action taken. It means lack of (or insufficient) funds for M&E
World Bank	Para. 102	Findings. Governance	it is not a perception of “increased role of GEFSEC”, it is a factual statement	No action taken. It has been reported during interviews and therefore it has to be reported as a perception.
UNIDO	Para. 49	Findings. Broader and Longer-term Programmatic Results	discussions with the UNIDO Project Manager have highlighted that replication differed from country to country due to various levels of awareness, existence (or non-existence) of relevant policies, and willingness of industry to pursue EnMS. The GEF IEO may want to consider incorporating these insights as lessons learned for replications efforts under future projects/programs.	No action taken. While what reported by the project manager is useful, it would have to be cross-checked with other factual evidence. Besides, differences between country settings are to be expected when working in multiple countries. Is this really a lesson?