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Citizen Engagement: An Independent Review of the World Bank's Commitments in Design and Practice in Myanmar

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A4EA is implemented by a consortium consisting of the Institute of Development Studies (IDS), the Accountability Research Center (ARC), the Collective for Social Science Research (CSSR), the Institute of Development and Economic Alternatives (IDEAS), Itad, Oxfam GB, and the Partnership for African Social and Governance Research (PASGR). Research focuses on five countries: Egypt, Mozambique, Myanmar, Nigeria and Pakistan. A4EA is funded by aid from the UK government. The views expressed in this publication do not necessarily reflect the official policies of the funder.

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Disclaimer

The findings, interpretations, and conclusions expressed here are those of the authors.

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Acronyms and Abbreviations

A4EA	Action for Empowerment and Accountability	ICT	Information and communication technology
AF	Additional Financing	IDS	Institute of Development Studies
ARC	Accountability Research Center	IEG	Independent Evaluation Group
BIC	Bank Information Center	IPF	Investment Project Financing
CBO	Community-based organization	IPPF	Indigenous Peoples Planning Framework
CDD	Community-driven development	KII	Key informant interview
CE	Citizen engagement	M&E	Monitoring and evaluation
CEPF	Community Engagement Planning Framework	NGO	Non-governmental organization
CSO	Civil society organization	OM	Operational manual
DFID	Department for International Development	PAD	Project Appraisal Document
DLI	Disbursement linked indicator	PDO	Project Development Objective
EE	Enabling environment	PID	Project Information Document
ESMF	Environmental and Social Management Framework	PMU	Project Management Unit
FCV	Fragile, conflict and violent	PSIA	Poverty and Social Impact Analysis
FGD	Focus group discussion	RAP	Resettlement Action Plan
FY	Fiscal year	RF	Results Framework
FSDP	Financial Sector Development Project	RPF	Resettlement Policy Framework
GAP	Gender Action Plan	SESA	Strategic and Environmental Social Assessment
GPSA	Global Partnership for Social Accountability	TPM	Third party monitoring
GRM	Grievance redress mechanism	WBG	World Bank Group

Executive Summary

In 2013 World Bank president Jim Yong Kim publicly promised that the institution would improve its engagement with citizens by incorporating feedback into 100 percent of projects with identifiable beneficiaries. The goal took formal shape as the 2014 *Strategic Framework for Mainstreaming Citizen Engagement* (CE Strategic Framework), which “incorporates citizen engagement, including beneficiary feedback, specifically in its treatment of inclusion, which entails empowering citizens to participate in the development process and integrating citizen voice in development programs as key accelerators to achieving results” (World Bank 2014:1). World Bank management utilized President Kim’s promise as the basis for a new minimum institutional mandate requiring World Bank projects to incorporate at least one project mechanism to engage citizens, one indicator to monitor progress, and to report on the indicator by the third year of implementation.

How and to what degree is the World Bank putting its new institutional citizen engagement (CE) commitments into practice? This question guided an initiative undertaken by the Accountability Research Center (ARC) at American University as part of the Institute of Development Studies’ (IDS) Action for Empowerment and Accountability (A4EA) investigation into how external actors are attempting to support local processes and conditions for empowerment and accountability in fragile, conflict and violent (FCV) settings.

This kind of in-depth analysis of CE in project design is necessary but not sufficient to assess whether and how the World Bank and government partners actually implement those commitments. Therefore, ARC developed a two-track monitoring approach: First, independently monitoring *whether and how* the World Bank is integrating CE into project design, the critical early stage of donor involvement. And second, utilizing findings on CE in project design to monitor *how* CE commitments are *actually* being carried out in implementation.

For this initiative, ARC primarily focused on the first track, analyzing citizen engagement commitments in World Bank project design (Fiscal Years (FY) 2015–17) across four A4EA priority countries: Mozambique, Myanmar, Nigeria and Pakistan. This included 57 projects ranging from US\$19 million to over US\$600 million. In April 2019, ARC and IDS published a comparative synthesis report on the results from all four country project design assessments.

The country assessment presented here features ARC’s investigation of World Bank projects in Myanmar, the only country among the four where ARC undertook fieldwork on CE in implementation. This report therefore contributes to both tracks, reporting on CE commitments in design across the FY15–17 portfolio (eight projects) as well as findings on CE in implementation for the three projects furthest along in implementation at the time of fieldwork (2017-18): *National Community Driven Development, Ayeyarwady Integrated River Basin Management and Essential Health Services Access.*

This research is one component of A4EA’s broader investigation into how external actors, particularly large donors, are supporting empowerment and accountability in fragile, conflict and violent (FCV) settings. The CE Strategic Framework is particularly relevant for FCV settings because it provides guidance for how large-scale development projects could encourage arenas for collective citizen action, as well as state response capacity, which otherwise might be lacking. ARC therefore

utilized the CE Strategic Framework as the basis for an original assessment tool that examines commitments to CE in World Bank projects. It incorporates seven priority areas for CE including:

- Consultation during project preparation
- Collaborative decision-making during project implementation
- Citizen feedback opportunities throughout the project life cycle
- Citizen involvement in project monitoring
- Grievance redress mechanisms (GRMs)
- Capacity building for CE
- Improved CE monitoring and results reporting

The approach then expands the scope beyond CE project mechanisms to three additional measures that ARC hypothesizes could potentially facilitate an enabling environment (EE) for CE. These include:

- **Measures for proactive social inclusion** (i.e., related to gender, disability, ethnicity, age, migrant status, etc.) in CE efforts
- **Third party monitoring** for project results and citizen feedback findings—which could inform CE if accompanied by
- **Proactive public information disclosure** of project results and findings from citizen engagement efforts and the project progress.

This analysis sought to determine if a project commits to seeking a strategic approach to CE, meaning the degree to which there is the potential for synergy across the different tactics incorporated. This assessment attempts to distinguish between projects that apply the CE framework in a minimalist, “tick the box” manner – a “thin” approach using the language of a recent Independent Evaluation Group (IEG) study, and projects that commit to pursuing multiple CE mechanisms – a “thick” approach. An original Citizen Engagement Density Scale was developed to assess the “thickness” of project commitments across five categories and categorize them as *Robust*, *Comprehensive*, *Intermediate*, *Weak*, and *Low*.

The key findings from the desk review of CE commitments in the Myanmar projects and subsequent fieldwork on project implementation, which will be discussed greater detail in the final section of this paper, include:

CE in Design of Myanmar Projects

- The ARC CE Density Scale classifies the Myanmar FY15-17 projects as: *robust* (4 projects), *intermediate* (3 projects), and *low* (1 project). Of the four projects ranked in the robust category, three committed to activities in all 10 of the World Bank-prioritized CE areas and the three ARC-identified measures that potentially support an enabling environment for CE. Only one project design fell short of the Bank’s minimum institutional CE requirements. These Myanmar projects committed to create spaces for engagement and open opportunities for communities to claim accountability.
- All but one of the Myanmar projects committed to a wide range of CE activities, including at least five of the seven priority CE categories in their design plans. These included: community consultations; engaging citizens in decision-making; soliciting feedback during implementation; operating a project-level GRM; and including at least one indicator to measure CE outcomes.

- Seven of the eight projects met the World Bank minimum requirement to commit to measure at least one aspect of CE through an indicator in their public monitoring system (called a Results Framework), with three projects going a step farther to incorporate two CE indicators in their project design.
- Seven of the eight Myanmar projects committed to adopting measures for proactive social inclusion in CE processes. The majority focused on gender inclusion, and most projects recorded multiple and detailed commitments for including women in a broad range of CE activities. Yet few projects concretely addressed the proactive engagement of other socially excluded groups acknowledged in project design, such as migrants, people with disabilities, people living in poverty and landless people.
- Only three of the eight projects committed to both third party monitoring and proactively disclosing project results to the public. Only two projects committed to disclosing findings from third party monitoring of CE activities. This is a lost opportunity because, if utilized consistently, these complementary areas could enable third party monitoring to effectively contribute to participation by informed citizens.

CE in implementation of Myanmar projects

- The field work identified significant gaps between CE commitments and what projects actually implemented in two of the three projects investigated, the *Essential Health Services Access* and *Ayeyarwady Integrated River Basin Management* projects. The research found that only the *National Community Driven Development Project* carried out its CE design commitments consistently. These discrepancies highlight the significant limitation of assuming that project commitments captured in public program documents will in fact be met in practice.
- All three projects committed to engaging in collaborative decision-making and soliciting citizen feedback, but the fieldwork often revealed weaknesses in implementation.
 - ▶ The *National Community Driven Development Project* provided citizen committees decision-making capabilities in practice, yet budget constraints and some rigid project regulations limited full execution of community development priorities.
 - ▶ The *Essential Health Services Access Project* committed to facilitating collaborative consultations and gathering feedback with far greater frequency and regularity than it actually carried out in practice. When the project did undertake its promised CE measures, it is not clear that it utilized the feedback to inform implementation – or had systems in place to make this feedback loop possible.
 - ▶ In the *Ayeyarwady Integrated River Basin Management Project*, community members were unaware of the existence of key CE commitments, such as the Stakeholder Forum, which was presented in design documents as if it would have significant influence over project decision-making. In addition, they believed there had been bias in the selection of the villages and individuals who participated in consultations.
- CE commitments without pre-assigned budgets become unfunded mandates. The fieldwork found that projects were likely to prioritize other kinds of activities over CE commitments if not explicitly required to use resources for that purpose.

- Public access to project operational manuals is crucial for informed CE, yet only the *National Community Driven Development Project* proactively made its operational manual publicly available. In contrast, neither the government nor the World Bank made public the operational manuals for the *Essential Health Services Access* and *Ayeyarwady Integrated River Basin Management* projects. According to respondents, few beneficiaries knew of the manuals' existence or importance.
- Although all three projects committed to implementing a GRM, the fieldwork found that only the *National Community Driven Development Project* had a system that was sufficiently operational to receive and respond to complaints. Yet, because that project actively encouraged communities to submit praise to the GRM, it is difficult to evaluate how it functioned in practice as a mechanism to resolve project grievances.
- The fieldwork revealed that beneficiaries across all three projects lacked sufficient understandings of the CE opportunities to which projects committed and the entitlements they were supposed to afford citizens. The lack of materials in Burmese, with fewer materials available in other national languages, only exacerbated this lack of understanding. Therefore, for citizens to be able to take advantage of available engagement opportunities, the opportunities need to be more clearly explained and translated (literally into national languages and figuratively into accessible terminology).

I. Introduction

1.1 Background

“We must become a better listener,” the World Bank’s then-president Jim Yong Kim acknowledged during his keynote speech at the World Bank/IMF 2013 Annual meeting. He continued: “Last year we had beneficiary feedback on 34 percent of our projects. We promise that for our projects with clear beneficiaries, we will get feedback—from every single one of them, 100 percent” (Kim 2013). By announcing this to an audience of high-level government officials, President Kim committed the World Bank to improving how it engages with the people affected by its projects and to developing measurements of these achievements.

In 2014, World Bank management translated Kim’s public promise into a set of corporate requirements for citizen engagement (CE) in Investment Project Financing (IPF) operations. IPFs are the Bank’s leading lending instrument and are used for long-term operations (i.e., periods of 5 to 10 years) across all sectors, but primarily concentrated in infrastructure, human development, agriculture, and public administration (World Bank 2018d). The new CE requirements oblige IPF operations with “identifiable beneficiaries” and approved between Fiscal Year (FY) 2015 and FY 2017 (between July 1, 2014 and June 30, 2017) to: (1) incorporate at least one CE mechanism; (2) integrate at least one indicator to monitor CE; and (3) report on the CE indicator by the third year of project implementation (World Bank 2018a).

To provide operational guidance for meeting the new institutional CE mandate and to more systematically incorporate CE into operations, the World Bank then produced a *Strategic Framework for Mainstreaming Citizen Engagement* (abbreviated in this report as “CE Strategy”).¹ As laid out in the CE Strategy, the World Bank envisions citizen engagement as:

the **two-way interaction between citizens and governments** or the private sector within the scope of WBG interventions—policy dialogue, programs, projects, and advisory services and analytics—that gives citizens a stake in decision-making with the objective of improving the intermediate and final development outcomes of the intervention (Manroth et al. 2014:8).

This definition establishes World Bank-fostered CE as *reciprocal* and *bounded*. It is *reciprocal* because it requires government to respond to citizen demands and not simply extract their input for consideration. Yet it is *bounded* because it applies only to government–citizen interactions “within the scope of WBG [World Bank Group] interventions” and therefore stops short of considering the implications for broader citizen–state relations and accountability.

How and to what degree is the World Bank actually embedding mechanisms for citizen engagement in project design? In 2017, the Accountability Research Center (ARC) at American University, a member of the Institute of Development Studies’ (IDS) Action for Empowerment and Accountability (A4EA) Program, launched a two-track approach to monitoring and advocacy regarding the World Bank’s fulfilment of its CE agenda.² This research comprises one component of A4EA’s broader investigation into whether and how external actors, particularly large donors,

are supporting empowerment and accountability in fragile, conflict and violent (FCV) settings. A4EA chose to focus this component on the World Bank because, even as civic space around the world is restricted, the World Bank has the potential to support government counterparts to protect and foster the contribution of citizen voice to development effectiveness. ARC's World Bank CE research therefore encompasses a two-track monitoring and advocacy approach:

- The first track aims to independently monitor *whether and how* the World Bank is integrating CE into project design. It relies on a desk review of publicly available documents to identify how individual projects commit to incorporating CE throughout the project life cycle.
- The second track investigates project implementation, utilizing findings on project design commitments to CE to launch partner-led action research. It aims to monitor *how* CE commitments are *actually* carried out in specific World Bank projects of concern to stakeholders and requires extensive field research that is informed by local knowledge.

This report on Myanmar contributes to both tracks, reporting on CE commitments in design across the FY15–17 portfolio (eight projects) as well as findings from fieldwork in Myanmar for the three projects (*National Community Driven Development*, *Ayeyarwady Integrated River Basin Management* and *Essential Health Services Access*) that were furthest along in implementation.

To guide the independent monitoring process, ARC developed an assessment tool to identify the nature of the World Bank's commitments to CE as incorporated into project design. ARC's assessment tool utilizes the official project documents made public on the World Bank's website to identify whether and how projects commit to:

- **citizen engagement mechanisms throughout the project life cycle:** i.e., public meetings, satisfaction surveys, participatory monitoring throughout the project life cycle; and
- **mechanisms that could facilitate an enabling environment for CE:** i.e., third party monitoring, procedures for social inclusion, plans for proactive information disclosure.

By examining project commitments to specific CE activities along with mechanisms that strengthen the enabling environment for CE, the analysis seeks to answer two overarching questions: (1) to what degree do World Bank projects demonstrate a commitment to minimum standards for informed CE?; and (2) to what degree do projects go beyond a minimalist "tick the box" approach and demonstrate that there is both depth and specificity in individual CE commitments and a potential for synergy across the range of CE commitments?

To pilot the assessment tool, ARC undertook a desk review of all publicly available program documents for the IPF portfolios (FY15–17) in four A4EA priority countries: Mozambique, Myanmar, Nigeria, and Pakistan, jointly selected with A4EA funder, the Department for International Development (DFID). These four country portfolios include a total of 57 projects that range from US\$19 million to over US\$600 million. This research has produced four independent, in-depth reports for use by local civil society organizations (CSOs), researchers and policymakers that capture each country's unique findings, alongside a synthesis report.

To then test how the CE commitments are implemented, ARC and its in-country partner, the Bank Information Center (BIC), conducted pilot fieldwork in Myanmar on three of the FY15–17 projects at the most advanced stages of implementation. The country assessment presented here captures

the desk review and fieldwork findings from Myanmar. Over the three-year period studied, the World Bank had approved eight operations in the country, ranging from US\$100 million to US\$400 million.

This A4EA research recognizes that the World Bank, in contrast to other large-scale donors, rarely finances initiatives designed to target public accountability and empowerment. Instead, the Bank takes a more indirect approach to empowerment and accountability by funding government-led participation in “invited” spaces (Mansuri and Rao 2013:xi) created within projects whose main objectives are typically not empowerment related. The World Bank’s approach to civic engagement has been described in the literature as **induced participation** because it results from government- and donor-organized and/or funded efforts to which citizens are invited to participate and may be bureaucratically managed (Mansuri and Rao 2013:xi).³

Although induced participation continues to dominate the World Bank’s approach to CE, the institution has also published extensive research that documents the shortcomings of induced participation, including widespread patterns of “elite capture” (Mansuri and Rao 2013). Indeed, the CE Strategy openly acknowledges the literature documenting these risks (Manroth et al. 2014:95; see also Haque 2008 and Gugerty and Kremer 2008). However, in the World Bank’s current efforts to mainstream CE in its operations, it remains unclear whether or how projects address this key risk in design or implementation. The challenges posed by the World Bank’s primary approach to citizen participation underscores the relevance of independent assessment of whether and how meaningful spaces for CE are created in practice.

This introductory section continues by detailing the 2014 CE Strategy and its origins. Section 2 presents the findings from the Myanmar (FY15–17) desk review of CE commitments, beginning with quantitative results at the portfolio level, including ARC’s CE Density Scale, and then a qualitative analysis of each of the commitments. Section 3 synthesizes the fieldwork findings, detailing how the three investigated projects actually implemented the CE mechanisms they had committed to during project design. The report concludes by discussing findings and lessons from the two research tracks.

1.2 Citizen engagement and the World Bank

The World Bank’s 2014 CE Strategy is the outcome of more than 45 years of evolving engagement between the World Bank and civil society (for more in-depth discussion see Fox and Brown 1998; Davis 2004; World Bank 2005; Bebbington et al. 2006; World Bank 2007; World Bank 2012; Manroth et al. 2014; World Bank 2018). Key precursors include the following:

- Adoption of social safeguard policies: in 1980, setting protections and compensation standards for people affected by project-caused involuntary resettlement, and in 1982, setting mandated protections for indigenous peoples.
- Publication of *Putting People First: Sociological Variables in Rural Development* (1985), the first World Bank publication concerned with the roles of people and local associations in development projects.
- Formation of the Participatory Development Learning Group (1990), the first body convened to develop approaches and practices for participation in World Bank operations.

- Establishment of the World Bank’s Inspection Panel (established 1993, operationalized 1994)—an independent accountability mechanism to which people who believe they have been adversely affected by Bank-financed operations can bring their concerns. The panel determines whether Bank projects have complied with their own policies and procedures.
- Publication of the 1996 *Participation Sourcebook*, the World Bank’s first official how-to publication for incorporating participatory approaches into projects.
- Formation of a Social Development network and department (1997).
- Development of guidelines for consultation with civil society (1999, updated 2002).
- Launch of the Social Development Strategy (2005) and Governance and Anticorruption Strategies (2007 and 2012), which prioritized social accountability and demand-side governance.
- Establishment of the Global Partnership for Social Accountability (GPSA) in 2012 to build capacity for CSOs to engage in social accountability initiatives.

The overall objective of the 2014 CE Strategic Framework is:

to facilitate mainstreaming of CE [Citizen Engagement] in WBG [World Bank Group]-supported policies, programs, projects, and advisory services and analytics to improve their development results and, within the scope of these operations, to strengthen engagement processes between governments and the private sector and citizens at the national, regional, local, or sectoral level, as applicable (Manroth et al. 2014:1).

Codified at the World Bank in 2013, CE is: “the two-way interaction between citizens and governments or the private sector ... that gives citizens a stake in decision-making with the objective of improving the intermediate and final development outcomes of the intervention” (Manroth et al. 2014:8). The World Bank claims that the CE Strategy goes beyond previous efforts because it is the first formalized framework, with institution-wide reach, that provides comprehensive guidance for engaging citizens from a project’s inception to its completion (Manroth et al. 2014:6).

The CE Strategy outlines several key categories of citizen engagement:⁴

1. **Consultation.** Formally, the term “consultation” in the context of World Bank projects captures engagement with citizens in the design or project preparation stage before an operation has been approved by the World Bank Board. The World Bank describes the objectives for citizen consultations to include receiving input about the design and implementation arrangements of a development program or project, in order to contribute to improved results and sustainability. Distinct from dialogue, the World Bank defines consultation as “a more structured exchange in which the convener commits to ‘active listening’ and to carefully consider the comments, ideas, and recommendations received.... Common consultation methods include public hearings or meetings, focus group discussions, household surveys and interviews, electronic consultations, and advisory/expert groups.” They can also include “more informal structures at the local level, such as village councils and women’s groups” (Manroth et al. 2014:42).
2. **Collaborative decision-making.** This process goes beyond consultation and integrates citizens directly into decision-making processes. The goal is to make decisions more responsive to citizens’ needs and improve the sustainability of program and project outcomes through

increased citizen ownership. Mechanisms for collaboration include “citizen/user membership in decision-making bodies, integrity pacts, participatory planning and budgeting, and citizens’ juries” (Manroth et al. 2014:43).

3. **Collecting, recording, and reporting on inputs from citizens.** This refers to citizen feedback collected periodically during and after implementation on different dimensions of provided services, including but not limited to effectiveness, inclusiveness, quality, delivery time, transaction costs, targeting, resource utilization or engagement processes. Tools utilized to capture citizen inputs include “satisfaction surveys, focus group discussions, hotlines, community scorecards, citizen report cards, or SMS/online feedback” (Manroth et al. 2014:44).
4. **Complaint and grievance redress mechanisms (GRMs).** These are complaint systems through which project-affected peoples can raise concerns, queries or clarifications related to implementation and through which complaints and grievances are addressed. For the purpose of this analysis, we have focused on project-specific GRMs rather than the more generic grievance redress service (GRS) offered via the World Bank’s online portal (Manroth et al. 2014:45).
5. **Citizen monitoring, evaluation and oversight.** Citizen monitoring goes beyond citizen feedback processes and directly involves citizens in monitoring service delivery, revenues, budget execution, procurement, contract awards, and reform policies. The philosophy behind such intensive citizen involvement is that it can increase transparency, improve efficiency of service delivery and budget execution, and reduce opportunities for corruption. Some commonly used mechanisms for citizen-led monitoring include “public expenditure tracking surveys, social audits, or citizen report cards” (Manroth et al. 2014:47).
6. **Capacity building for citizen engagement.** This capacity building is specifically designed for citizens, CSOs, communities, government officials, and national accountability institutions to strengthen their engagement and participation in project implementation (service delivery, natural resource management, public financial management, and/or Community Driven Development [CDD] projects).⁵ This is considered particularly necessary for World Bank-supported operations where CE approaches are introduced for the first time and include a focus on building government capacity for sustainability of engagement processes, beyond the life of a project (Manroth et al. 2014:50).
7. **Improved monitoring and results reporting.** The CE Strategy states that a key objective of the framework is to develop a better understanding of and monitoring of CE outcomes in World Bank-supported operations (Manroth et al. 2014:54–55). The Strategy emphasizes that projects would benefit from incorporating dedicated CE indicators into monitoring systems, especially within their Results Framework. (The World Bank’s definition of the Results Framework, its purpose and the mandates for public disclosure will be elaborated upon in Section 2.2.6.) Furthermore, the Strategy suggests incorporating third party monitoring to ensure independent, accurate reporting.

The CE Strategy’s status as a “strategy” rather than a “policy” means that on its own, it is not mandatory for project teams to implement it. The Strategy recognizes this and therefore links the recommended approaches to mandatory World Bank policies, such as those related to social and environmental safeguards. Specifically, “social safeguards” have been the World Bank’s primary mechanisms for addressing social issues in project design and implementation that provide a framework for community consultation and disclosure.⁶ Operations were required to apply social

safeguards when specialists determined that the projects would, or would be likely to, work with either of two specific vulnerable populations—indigenous peoples or beneficiaries that may be required to involuntarily resettle. When fulfilling safeguard requirements, two CE activities—consultation during project preparation and GRMs for project implementation—become mandatory. Therefore, safeguards have been viewed as an important and logical “entry-point” for CE activities, which could then lead to additional opportunities to integrate and expand CE measures beyond the limited requirements set by the Strategy.⁷ Furthermore, the CE Strategy identifies additional context-specific opportunities for scaling up CE.

The World Bank Group accompanied the release of the CE Strategy with a “corporate commitment” that “100 percent of Investment Project Financing with IBRD/IDA funding with clearly identified beneficiaries” incorporate citizen engagement by Fiscal Year (FY) 2018 (World Bank 2018a). IPFs are the World Bank Group’s leading lending instrument and it is utilized for long-term operations (i.e., periods of 5–10 years) across all sectors, but is concentrated in infrastructure, human development, agriculture, and public administration (World Bank 2018d). The corporate commitment specifies that IPF must meet the following three benchmarks:

- A Incorporate a **minimum of one mechanism** designed to engage beneficiaries in the specific context of the project.
- B Integrate a **minimum of one indicator** to monitor a particular aspect of CE during project implementation.
- C Report on the **beneficiary feedback indicator** by the third year of implementation (World Bank 2018a).

Furthermore, to be considered an acceptable CE indicator, a project indicator must meet one of the following two criteria:

- Clearly capture citizen feedback and in so doing report “whether there is a tangible response to close the feedback loop”.
- Monitor the extent to which citizens are involved in decision-making related to project design, implementation and oversight (World Bank 2018a).

It is essential to recognize that the accompanying corporate commitment is what now makes CE compulsory for IPFs. Civil society observers acknowledge that this represents important progress. Yet they have also expressed concern that project compliance with these minimal requirements will not ultimately lead to the operationalization of CE in World Bank projects. The minimal requirements, which oblige projects only to incorporate a single CE mechanism and indicator, allows for a “tick the box” approach to compliance. Therefore, World Bank monitoring risks falling short of capturing the extent to which projects are truly fulfilling the guidance laid out in the CE Strategy. Furthermore, the fact that projects are not responsible for reporting on results until the third year of implementation significantly limits the prospects that any citizen feedback collected will meaningfully inform implementation decisions.

1.3 Methodology: Independent monitoring of CE in World Bank program design

In this context, ARC developed a methodology to determine both *whether and how* projects operationalize the World Bank's commitments to CE in ways that tangibly contribute to empowerment and accountability. ARC's assessment tool combines two elements: an independent assessment of how projects commit to apply the World Bank Strategy's own approach; and an assessment of projects through the lens of additional relevant criteria.

The first element is based on the seven commitments the World Bank laid out for itself, incorporating each of the areas of CE prioritized in the Strategy (see Section 1.2), and investigating each area utilizing the criteria specified in the corporate commitments.

Second, the tool incorporates three additional areas that have the potential to create an enabling environment for CE. These include:

- Measures for proactive social inclusion (i.e., related to gender, disability, ethnicity, age, migrant status, etc.) in CE efforts.
- Third party monitoring and verification for project results and citizen feedback findings. The World Bank defines third party monitoring (TPM) as: "monitoring by parties that are external to the project or program's direct beneficiary chain or management structure to assess whether intended outputs, outcomes, and impacts have been achieved by the project. TPM is mainly used to provide an independent perspective on project or government performance. It can be conducted by CSOs, think tanks, academic institutions, media, or private firms. These organizations generally have greater skills for monitoring than community representatives" (Van Wicklin and Gurkan 2013:2).
- Proactive disclosure of the results from CE efforts and the project progress, as well as results beyond the Bank's minimal requirements.

By examining project commitments across these 10 areas, the analysis seeks to answer two overarching questions:

1. To what degree do World Bank projects demonstrate a commitment to minimum standards for informed CE?
2. To what degree do projects go beyond a "tick the box" approach and demonstrate that there is both depth and specificity in individual CE commitments and a potential for synergy across the range of CE commitments.

1.3.1 Data collection: application of the assessment tool

ARC's assessment tool relies on publicly available World Bank project documents that lay out project plans, strategies and commitments that have been approved by the World Bank's Board. The principal documents utilized in the analysis include (where available) the Project Appraisal Document (PAD), the Project Information Document (PID), the Integrated Safeguards Sheets, the Environmental and Social Management Framework (ESMF), and related social safeguard documents (Resettlement and Indigenous Peoples frameworks), when applicable. The World

Bank requires that all the above-mentioned documents be publicly disclosed via its online operations portal.

In principle, this assessment would also include operational manuals (OMs), which all projects develop after receiving World Bank Board approval to describe and codify the implementation plans meant to achieve project goals. The OM is the primary resource for members of the public and government agencies to learn how project goals are translated into concrete actions. For government–society engagement, the OM translates World Bank project commitments into specific actions, processes and benchmarks in each national context. This “translation” is also key for CSOs and citizens who want to observe or monitor how a project is functioning. However, the World Bank does not have an institutional mandate that OMs must be disclosed and therefore they are typically not available to the public. In the case of Myanmar, as far as this investigation could determine, only one of the eight projects (the *National Community Driven Development Project*) made its OM available to the public. This means that in practice, for the other seven projects, public access to the primary operational document that details how a project will meet the approved objectives is left to the client government’s discretion. When government agencies do not proactively disclose their specific decision-making processes or project rules and performance benchmarks, this has major implications for the prospects for informed CE and for accountability. The implications of the *National Community Driven Development Project* having proactively disclosed the OM will be discussed in Section 2.2.6 and 4.1.

ARC’s project assessment process is never automated, and there is a strict policy of secondary or peer review to corroborate judgements made about the depth and detail of individual CE commitments and ensure consistent application across projects and portfolios. Once the data have been collected from the publicly available World Bank documents, they undergo a quantitative and qualitative analysis. The processes for each are explained in the sections below.

1.3.2 Quantitative analysis: establishing a CE Density Scale

To answer the question of *whether* World Bank projects are operationalizing institutional commitments to CE, ARC developed and piloted a Citizen Engagement Density Scale that considers the seven World Bank priority CE indicators and three enabling environment (EE) indicators discussed above. The density scale builds from Independent Evaluation Group (IEG) findings that:

“thick” approaches—those combining multiple tools to enable collective action and public sector responsiveness—are more promising than “thin” approaches—those that are not matched with vertical integration of independent monitoring and oversight or do not include support to increase a government’s capacity to respond (World Bank 2018c:xiii).

A thick approach to CE commitments combines a project’s inclusion of the various CE activities laid out in the World Bank’s Strategy with mechanisms or practices that could create an enabling environment to further advance citizen action. The creation of an enabling environment is facilitated through the proactive social inclusion of marginalized groups in consultation processes, and the inclusion of independent/external monitoring with public disclosure of results. While the thick versus thin distinction may be intuitive and subjective, this desk review attempts to capture greater nuance by classifying the range of density of commitments according to five different categories: *Robust*, *Comprehensive*, *Intermediate*, *Weak*, and *Low*. Table 1 depicts the combined CE and EE numerical criteria for each level.

Table 1. CE Density Scale

ROBUST			COMPREHENSIVE			INTERMEDIATE			WEAK			LOW		
CE	+	EE	CE	+	EE	CE	+	EE	CE	+	EE	CE	+	EE
7		2-3	7		0-1	6		0	4		0-1	2		0-1
6		3	6		1-2	5		0-2	3		0-2	1		0-2
			5		3	4		2-3	2		2-3	0		0-3
						3		3	1		3			
Key		CE = Citizen Engagement Indicators; Maximum = 7						EE = Enabling Environment Indicators; Maximum = 3						

A project's rating on the scale depends on a combination of its CE and EE commitments. The final tally, however, is not based on a simple total of commitments within the 10 possible CE and EE options. Rather, it results from a weighted combination of two complementary approaches to enabling citizen action. In other words, a project's thickness is based on counting the number of tools for citizen action (from zero to seven) that a project describes and then determining if and how they have matched with efforts that create an enabling environment for CE. ARC's CE Density Scale therefore reports on how mechanisms for social inclusion, external monitoring and public disclosure can potentially reinforce the officially recognized modalities for creating enabling environments for CE and accountability.

Although the number of CE commitments is the first step to determining the thickness of a project's approach, the final determining factor is what the project contributes to the enabling environment. For example, Table 1 shows that a project that includes commitments in all seven World Bank-prioritized CE areas could fall in one of two categories: *Robust* or *Comprehensive*. Seven commitments guarantee a rank in one of the top two categories. However, these seven CE commitments, if not matched with at least two of the EE indicators, are not sufficient for a project to qualify as *Robust*. To be considered *Robust*, the project must also include commitments to at least two of the EE indicators.

1.3.3 Qualitative analysis: the quality of commitments, based on depth and detail

To answer the question of *how* the World Bank is operationalizing its commitments to CE in ways that could foster accountability and empowerment, this assessment then investigates the content of the commitments. First, the assessment considers the detail and depth with which CE mechanisms and processes are explained, in terms of how they will operate and how they will incorporate stakeholders so that their inputs shape project decisions and implementation. Examples of questions that guide the process of determining the depth and detail of CE mechanisms include the following:

1. **Collaborative decision-making:** For projects that commit to collaborative decision-making, do they specify the mechanisms and/or activities through which this would be carried out during implementation?

2. **Collecting feedback:** For projects that commit to collecting citizen feedback, do descriptions of the planned mechanisms explain how feedback solicited and collected will be integrated to inform project implementation (closing the feedback loop)?
3. **Grievance redress mechanism (GRM)**
 - a. For projects that commit to establishing a GRM, who will manage it (i.e., the same unit charged with managing the project, which could be a subject of complaints)? Will it be under the authority of, or subject to oversight by, a third party organization to avoid conflicts of interest?
 - b. What GRM data will be disclosed? Will disclosure involve numbers of complaints received and resolved? Will data that are released cover the nature of the grievances and their resolutions?

Second, the assessment considers the detail and depth with which the project commits to fostering an enabling environment for CE. The hypothesis guiding this approach is that the less precise a CE commitment is at the project design stage, the easier it becomes for project authorities to impose their interpretations. The risk therefore is that without sufficient specificity, CE plans can be diluted into a “tick the box” exercise during implementation. For example, the assessment asks the following kinds of specific questions:

1. **Social inclusion:** For projects that commit to proactive inclusion, do they provide details on the approaches that will be undertaken to include marginalized and/or socially excluded groups in CE activities? What groups are specifically identified and what are the mechanisms explained for reaching out to and incorporating them?
2. **Public disclosure:** For projects that commit to public disclosure, are specific mechanisms for the disclosure detailed? Does the project commit to frequency of public dissemination activities or explain exactly what will be shared?
3. **Funding for CE:** Has the project allocated funds to support CE commitments?

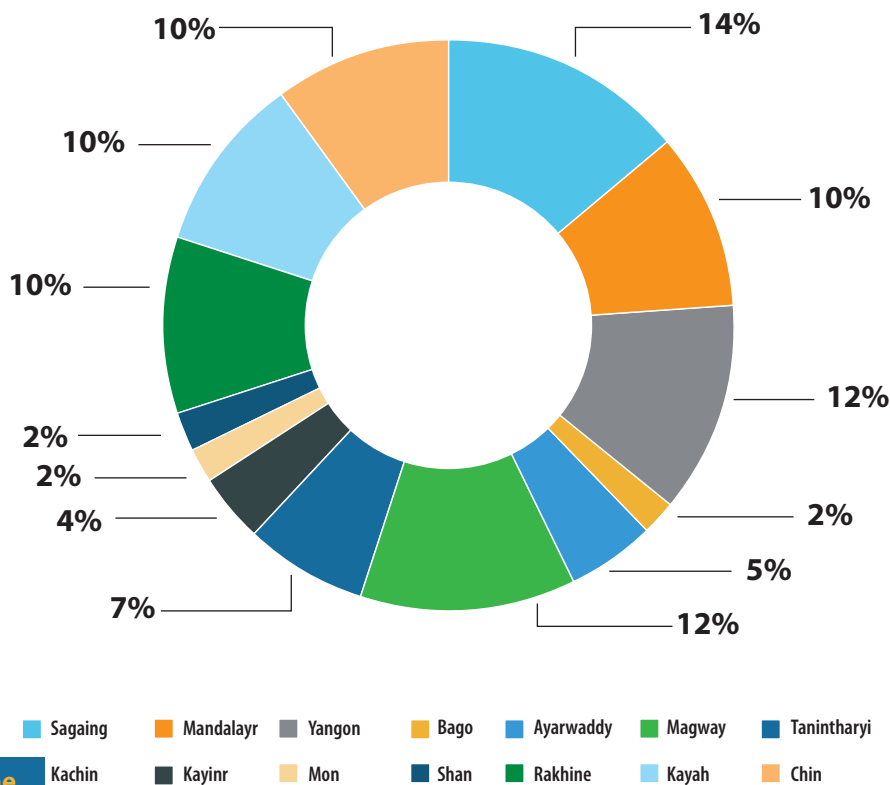
Utilizing this two-tiered approach to quantitative and qualitative analysis, ARC then determines the degree to which a World Bank project’s commitments to engaging citizens throughout its life cycle add up to a strategic approach, which, if implemented, could tangibly contribute to empowerment and accountability.

1.3.4 Assessing how CE commitments are carried out in practice: pilot fieldwork in Myanmar

To test the Myanmar portfolio desk review findings, ARC (Research Fellow Rachel Nadelman) and BIC (Myanmar Program Coordinator Wunna Htun) conducted a first phase of fieldwork in Myanmar between August and September 2017. The team focused on the three Myanmar FY15–17 IPFs that had advanced the furthest in implementation by that time: Additional Financing for the *National Community Driven Development*, *Ayeyarwady River Basin Management* and *Essential Health Services Access* projects. Nadelman and Htun interviewed 53 stakeholders in the Yangon, Magway and Mandalay regions, including World Bank staff, international non-governmental organization (NGO) partners collaborating on the projects, project implementers, government staff, affected community members and beneficiaries, staff and volunteers working with local CSOs, and elected local leaders.

With additional support from the Institute of Development Studies (IDS), and under Nadelman’s supervision from Washington, DC, Htun continued the investigation of CE in implementation of the three projects from mid-November 2017 to July 2018. This research included undertaking fieldwork in 8 of Myanmar’s 14 regions and states⁸ and involved a wide range of people involved with the projects in different capacities (approximately 100 people attended the different con-sultations Htun organized). The five regions (Ayeyarwady, Bago, Magway, Mandalay and Yangon) and three states (Kayah, Kayin, and Mun) were selected based on geographical accessibility, con-flict sensitivity, implementation status of the projects, and existing partnerships with local CSOs and communities. The stakeholders consulted included World Bank project consultants and staff, Myanmar government officials, project implementation personnel, representatives from CSOs from the investigated states and regions, local government officials, members of affected local communities, and other concerned citizens. For the *Essential Health Services Access Project*, Htun and Nadelman augmented the qualitative research with a brief online survey which asked gov-ernment and NGO workers responsible for different aspects of project implementation about their knowledge and experience. Carried out through Facebook, 50 percent of the 200 public health personnel targeted responded, representing 13 of Myanmar’s 14 regions and states (as shown in Figure 1).

Figure 1. Regional composition of respondents for the Essential Health Services Access project, Myanmar FY15–17



Not on the graph?

A detailed analysis of the investigation into how CE commitments in the three projects are implemented and the main findings from the Myanmar fieldwork are elaborated in Section 4.

II. Myanmar: Pilot Application of the Assessment Tool

2.1 Portfolio overview and analysis

To pilot this assessment tool and approach, ARC reviewed the Bank's FY15–17 IPF portfolio in Myanmar. This includes eight investment operations that range from US\$100 million to over US\$400 million. Table 2 introduces the Myanmar FY15–17 IPF portfolio, presenting basic operational information (i.e., year of approval, financing amount, application of social safeguards) alongside the numerical ARC assessment findings on CE and the enabling environment (EE). The table is organized in descending order from those projects with the most CE and EE commitments to those with the least. One of the eight projects, the *National Community Driven Development Project (FY15)*, has a classification of "Additional Financing" (AF), which means that the project provides a new infusion of financing for a project that had been approved earlier, either to extend implementation or to begin a new phase.

The section that follows the table provides an overall picture of the World Bank's approach to CE in the FY15–17 Myanmar portfolio, showing where commitments were concentrated and/or neglected. The discussion responds to the first part of the guiding research question presented above—i.e., how did the portfolio commit to operationalizing CE at different critical moments throughout the project life cycle? The subsequent sections cover the project-level analysis that explores the content of the range of commitments as documented. This section goes beyond the existence of a documented commitment that appears to meet the criteria of the different CE areas and assesses the commitments in terms of their potential to tangibly contribute to creating enabling environments for citizen action and bolstered capacity and incentives for state response to citizen voice.

Table 2. CE overview by project, Myanmar FY15–17 (in descending order of CE commitments)

Myanmar Projects (FY15–17)	Commitment Amount US\$ (Million)	Social Safeguards	World Bank CE Strategy Priority Areas									Indicators of Enabling Environment for CE			Total World Bank CE commitments	Total Enabling Environment indicators
			Consultations reported	Collaborative decision-making	Citizen feedback collection	Citizen monitoring	GRM	CE capacity building	Results Framework Indicator(s) for CE	Proactive social inclusion	Third party monitoring	Proactive information disclosure				
National Community Driven Development FY15 (AF ²)	400	IP+IR	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7	3
Essential Health Services Access FY15	100	IP	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7	3
Agricultural Development Support FY15	100	IP+IR	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7	3
Flood and Landslide Emergency Recovery FY17	200	IP+IR	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7	2
National Electrification FY16	400	IP+IR	Yes	Yes	Yes	No	Yes	No	Yes	No	Yes	Yes	Yes	No	5	2
Ayeyarwady Integrated River Basin Management FY15	100	IP+IR	Yes	Yes	Yes	Yes	Yes	No	Yes	No	Yes	Yes	No	5	1	
Southeast Asia Disaster Risk Management FY17	130	IR	Yes	Yes	Yes	No	Yes	No	Yes	Yes	Yes	No	No	5	1	
Financial Sector Development FY17	100	None	No	No	No	No	No	No	No	No	Yes	No	No	1	0	
TOTAL COMMITMENTS		7	7	7	7	5	7	4	7	7	7	5	3			

2.1.1 CE Density Scale

As described in the Introduction, “thick” approaches to CE commitments combine a project’s inclusion of the various CE activities laid out in the World Bank’s CE Strategy with mechanisms or practices that potentially contribute to an enabling environment for CE. ARC’s original CE Density Scale establishes parameters for understanding the variations of thickness and thinness in project CE commitments (see Table 1). The density is determined based on existence of commitments, not an interpretation of the quality or lack of quality of the commitment as documented. As already discussed, the determination of where a project ranks is based on a balance between planned CE mechanisms and contributions towards an enabling environment for CE, and not simply an absolute total of CE + EE commitments. For the CE Density Scale, classifications for the range of CE commitments, from highest to lowest, include *Robust*, *Comprehensive*, *Intermediate*, *Weak*, and *Low*.

Table 3 and Figure 2 depict Myanmar’s eight FY15–17 projects according to the ARC CE Density Scale. The results show that these projects are ranked as follows: *Robust* (4), *Comprehensive* (0), *Intermediate* (3), *Weak* (0), and *Low* (1)

Table 3. CE Density Scale, Myanmar FY15–17 (8 projects)

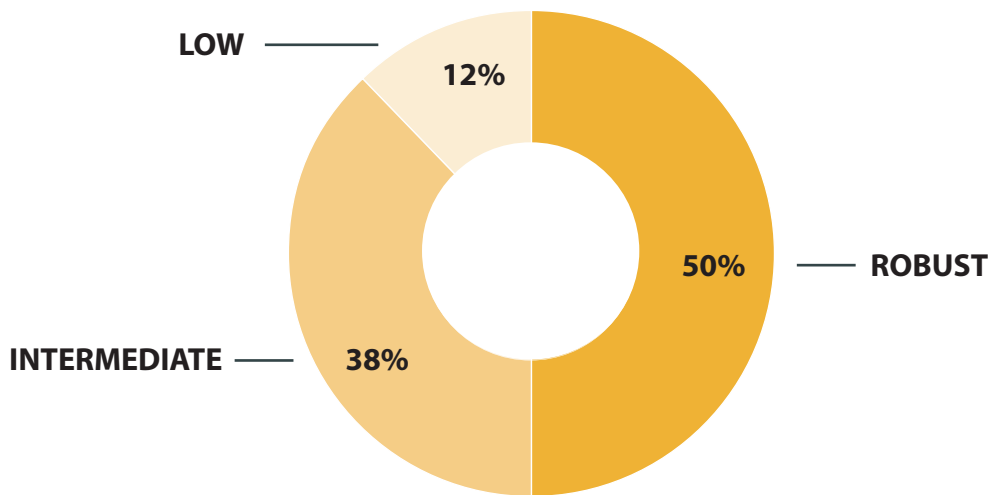
ROBUST 4 projects (50%)	COMPREHENSIVE None	INTERMEDIATE 3 projects (38%)	WEAK None	LOW 1 project (12%)
<u>7 CE + 3 EE</u> National Community Driven Development FY15 Essential Health Services Access FY15 Agricultural Development Support FY15		<u>5 CE + 2 EE</u> National Electrification FY16 <u>5 CE + 1 EE</u> Ayeyarwady Integrated River Basin Management FY15 Southeast Asia Disaster Risk Management FY17		<u>1 CE + 0 EE</u> Financial Sector Development FY17
<u>7 CE + 2 EE</u> Flood and Landslide Emergency Recovery FY17				

Four Myanmar projects are classified as Robust (50% of the portfolio): The *National Community Driven Development*, *Essential Health Services Access*, *Agricultural Development Support*, and *Flood and Landslide Emergency Recovery* projects pledge commitments in all seven World Bank priority CE areas. These four projects in the *Robust* category for CE also most consistently met the three ARC-identified benchmarks for an enabling environment for CE. All four include measures for proactive social inclusion and third party monitoring. Three of the four (excluding the *Flood and Landslide Emergency Recovery Project*) expressed the intention to proactively disclose some information about project results beyond institutionally mandated minimums.

The next grouping in the Myanmar portfolio involves the Intermediate category. It includes three projects—*Ayeyarwady Integrated River Basin Management*, *Southeast Asia Disaster Risk Management*, and *National Electrification*—that documented five out of seven different CE commitments with two or fewer commitments to mechanisms that can build an enabling environment for CE. The latter two projects are identical in terms of the CE areas they committed to and ones they left out. Neither included community members in monitoring processes nor planned for capacity building to support CE efforts. The *Ayeyarwady Integrated River Basin Management Project* is distinct from the other two in this category. It is the only project that did not include an indicator measuring an aspect of CE. All three projects in the intermediate category committed to incorporating proactive social inclusion measures in several of the planned CE activities, whereas only the *National Electrification Project* commits to meeting one other EE benchmark—that of third party monitoring. None of the three projects committed to proactive information disclosure.

With only one CE commitment and no EE commitments, Myanmar’s *Financial Sector Development Project* is the only project in the portfolio categorized as *Low*. This project did not document any plans for CE activities for the duration of the project life cycle. However, it included a monitoring indicator dedicated to measuring CE in its Results Framework, representing its only CE commitment. There is a crucial factor that separates this project from the rest of the Myanmar FY15–17 portfolio: it is the only project that did not trigger either of the social safeguards—involuntary resettlement or indigenous peoples. As discussed earlier, the triggering of social safeguards mandates projects to incorporate, at a minimum, CE measures with the specified vulnerable populations, including pre-appraisal community consultations, consultation/collaboration during implementation, and a project-level GRM. Therefore, it could be interpreted that because the project avoided the Bank’s directive to include social safeguard-mandated CE activities, it did not incorporate any plans for such activities in the descriptions of project components. The fact that the *Financial Sector Development Project* committed to measuring CE while not documenting any commitments in the narrative about project activities is notable and will be discussed below.

Figure 2. CE Density Scale, Myanmar FY15–17



2.1.2 Results by CE area

Figures 3 and 4 showcase each of the CE and EE areas, showing how many of the projects in the Myanmar portfolio include each mechanism/activity, from greatest to fewest. Figure 3 focuses on the seven CE areas prioritized in the World Bank's CE Strategy, while Figure 4 highlights the ARC-identified indicators of an enabling environment for CE. The portfolio-level analysis only reports on the *existence* of commitments and not the *quality or lack of quality* of those commitments. The analysis of content will follow in the next section. However, it is important to start with the aggregate level to see the range of commitments incorporated before investigating the depth of those commitments.

Figure 3. Project-level commitments to CE, Myanmar FY15–17

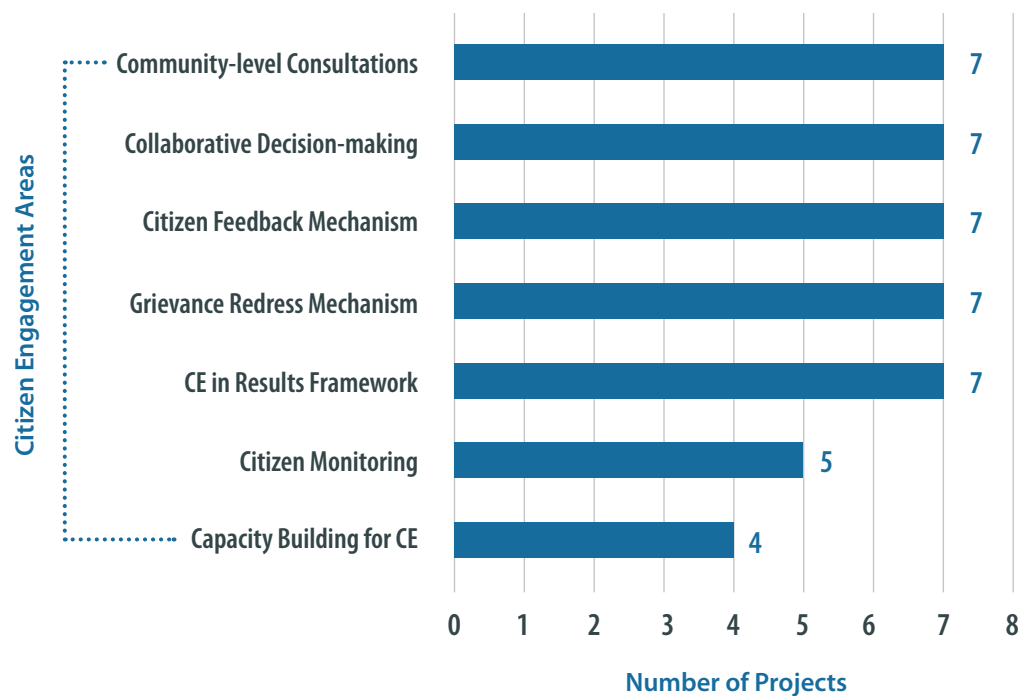


Figure 3 shows the assessment's findings that seven of the eight Myanmar projects committed to incorporating a range of CE activities throughout the project life cycle. These seven projects not only documented commitments to four of the CE categories described in the CE Strategy, but also committed to including at least one CE indicator in the project's public monitoring system.

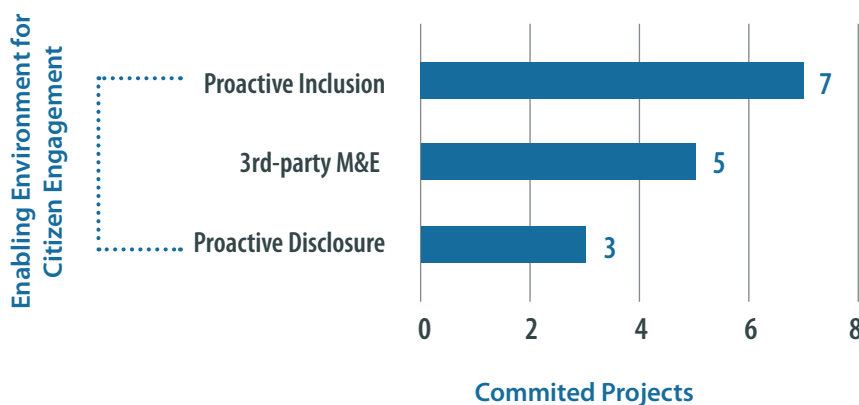
While most projects documented a range of CE commitments, there is no single CE category to which all eight projects committed. The top five CE categories with the highest level of documented commitments include: community-level consultation during project preparation; collaboration in decision-making; CE feedback mechanisms during and after project implementation; GRM; and the inclusion of at least one indicator in the project's Results Framework that reports on an aspect

of CE (seven projects each). This is followed by commitments to citizen involvement in monitoring and evaluation (five projects). The CE category with the fewest commitments (four) is capacity building for CE (for stakeholders including beneficiaries, government officials, etc.) to which only 50 percent of the portfolio documented commitments.

As discussed in the Introduction, the World Bank’s institutional mandate for citizen engagement in IPFs requires that projects include at least one indicator that reports on some aspect of CE in its internal reporting system, called the Results Framework. How the Bank defines the Results Framework, its purpose and the mandates for public disclosure related to indicator results will be discussed on in Section 2.2.6. As Figure 3 shows, seven of the eight Myanmar projects integrated at least one indicator to measure an aspect of CE in their project design. The exception is the *Ayeyarwady Integrated River Basin Management*, which did not meet the second requirement of the Bank-wide CE mandated minimums. For the seven projects that included an indicator intended to track and report publicly on CE-related activities, the full range of such activities and goals measured in the different projects will be discussed in the forthcoming section. At this level of analysis, it is important to remember that the number of commitments does not reveal anything about the depth or quality of CE or indeed if it will extend to populations not covered by safeguards. These issues are discussed within the in-depth analysis below.

Figure 4 visualizes the Myanmar portfolio results by CE area, showing thickness in all categories besides citizen monitoring and capacity building. Yet investigating the content of the commitments, in terms of how specific they are, shows a pervasive level of generality.

Figure 4. Indicators of an enabling environment for CE, Myanmar FY15–17

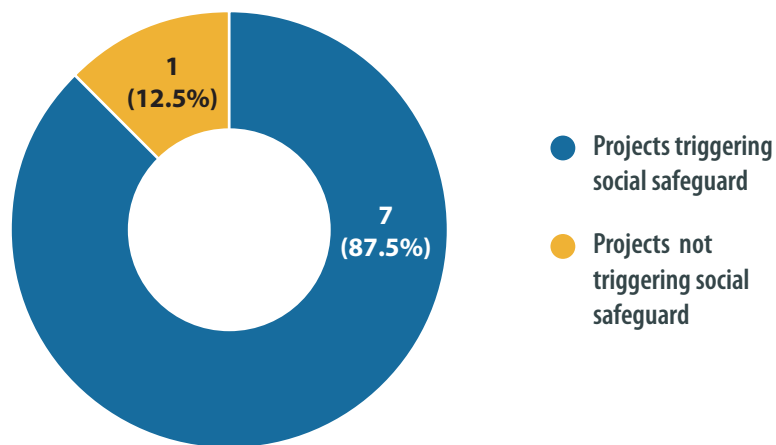


Besides the seven areas prioritized in the CE Strategy, Figure 4 reveals that at least 38 percent of the assessed Myanmar projects committed to one or more of the EE indicators for CE that include the three areas of social inclusion, third party monitoring, and proactive information disclosure.

A large majority of the Myanmar projects—seven of the eight—included commitments for inclusion of various population groups (primarily women followed by ethnic minorities and occasionally other socially excluded vulnerable communities) into CE processes. Five of the eight projects

(63 percent) committed to utilizing third party monitoring or incorporating external verification for some portion of project activities and results during the project’s life cycle. The World Bank CE Strategy asserts that third party monitoring increases the likelihood that monitoring results are impartial and accurate because citizens may feel more secure to report their feedback and there are no conflicting interests. Additionally, five of the eight Myanmar projects documented commitments to voluntary disclosure of some information related to project progress and outcomes, including CE in some cases, going beyond the minimal World Bank requirements for disclosure of information.

Figure 5. Projects applying social safeguards, Myanmar FY15–17



As explained in the Introduction, projects that have triggered social safeguard policies relating to indigenous peoples (Operational Policy/Bank Procedure 4.10) and/or involuntary resettlement (Operational Policy/Bank Procedure 4.12) are required to include consultations with beneficiaries during project design and implement a project-related GRM. Figure 5 visualizes the number of Myanmar projects—seven of the eight—that apply either or both of these social safeguards. These seven projects therefore meet the World Bank’s requirements of holding consultations with beneficiaries and also implementing a project-specific GRM. In Myanmar, indigenous peoples are not formally recognized; however, the country’s ethnic minority populations are given the status of indigenous peoples for Bank operations and therefore it is common for this social safeguard to be applied to projects in Myanmar working with identifiable beneficiaries.

The World Bank’s social safeguard mandates pre-dated the CE Strategy and President Kim’s increased attention to these issues. In principle, they are seen as strengthening incentives for implementing certain CE activities in projects applying social safeguards. However, as noted in the World Bank’s 2018 IEG assessment of CE, the application of social safeguards does not in practice mean that these “required” CE activities are carried out well or in full or reported as expected (World Bank 2018c:21). Therefore, it remains critical to investigate what the CE commitments actually include, even while recognizing the additional mandate that the application of social safeguards is assumed to add.

In Myanmar, the projects include some CE commitments that coincide with meeting safeguard mandates, yet Table 2 shows that most projects have also continued with CE commitments beyond those required by safeguard policies. This will be discussed in more depth below.

2.2 Analysis of CE commitment trends across projects

The previous section provided an overall picture of how the FY15–17 Myanmar portfolio has integrated the different components of the Bank’s CE Strategy into project design. In this section, the discussion moves beyond identification of the range of CE commitments to analyze their content, as far as possible, based on published plans versus evidence from implementation. The discussion will proceed according to the CE priority areas identified in the World Bank’s strategy. The next section focuses on the three ARC-identified indicators of a potential enabling environment for CE (i.e., proactive social inclusion, third party monitoring, and proactive information disclosure). Where relevant, the discussion draws on the projects that have committed to undertaking activities in the respective areas.

2.2.1 Consultations

In the context of World Bank projects, “consultation” refers to engagement with citizens in the design/project preparation stage *before* an operation has been approved by the World Bank Board. Distinct from dialogue, the World Bank defines consultation as “a more structured exchange in which the convener commits to ‘active listening’ and to carefully consider the comments, ideas, and recommendations received” (Manroth et al. 2014:42). The objectives for citizen consultation therefore include receiving input for improved decision-making in project design and implementation arrangements, which therefore should contribute to improved results and sustainability. Since citizen consultations are required for projects that apply social safeguards, this CE activity has historically been the most frequently incorporated into Bank operations.

In principle, citizen consultations undertaken during project preparation would inform the project design and implementation planning that is submitted to the World Bank Executive Board for approval. Therefore, unlike the CE data that are the basis for the rest of this report, information on consultations held with citizens comes from what Bank teams report they *have* done versus commitments to what they say they *will* do.

In the Myanmar portfolio, the seven projects that reported community-based consultations were required to implement one or both social safeguards. For both social safeguard policies, these projects had to document their community-based consultations and then disclose the summary of results through publications in both English and Burmese and live presentations. Table 4 shows the purpose(s) to which project teams dedicated these consultations, the formats utilized, and the people who were included (as well as numbers and locations where available).

TABLE 4. Consultation commitments, Myanmar FY15–17 (7 of 8 projects)

Project	Purpose and Format	With whom?
Southeast Asia Disaster Risk Management Project FY17	<p>Purpose: Environmental and Social Management Framework (ESMF) and Resettlement Policy Framework.</p> <p>Format: Interviews at night market (6), focus groups, questionnaires, public meetings.</p>	<p>Who: People living and/or working in areas where sub-projects will occur; "ethnically and economically diverse and representative of the township"; in Yangon (including night market vendors), Latha and Botahtaung townships.</p>
Flood and Landslide Emergency Recovery Project FY17	<p>Purpose: ESMF and project awareness.</p> <p>Format: Public hearings.</p>	<p>Who: Government departments, NGOs, Village Development Committee, Township Development Committee, village leaders and Department of Rural Development staff from central, regions, districts and township levels, churches, Village Development Committee in Bago (49 participants), Chin (75 participants), Yangon (26 participants).</p>
National Electrification Project FY16	<p>Purpose: ESMF and a Poverty and Social Impact Analysis (PSIA).</p> <p>Format: For ESMF: public meetings; for PSIA: key informant interviews (KII), focus group discussions (FGDs), questionnaires.</p>	<p>Who: <i>ESMF:</i> Public consultations were attended by local, national and international NGOs and CSOs, and state and local government officials. For PSIA: <i>rural areas</i>, 127 FGDs, 120 KII; 35 households per site where questionnaire administered, 525 total; <i>In urban areas</i>, 300 KIIs and 60 FGDs were conducted in Yangon, Mandalay and Hakha; 315 household interviews based on questionnaire.</p>
National Community Driven Development Project FY15	<p>Purpose: For ESMF including Indigenous Peoples and Resettlement Policy Framework.</p> <p>Format: For gender assessment: FGDs and KIIs. For ESMF, format not specified.</p>	<p>Who: NGOs/CSOs from beneficiary communities</p>
Agricultural Development Support Project FY15	<p>Purpose: Rapid gender assessment; project awareness and feedback on ESMF and general project plans.</p> <p>Format: Gender assessment: FGDs and KIIs. Consultations: format not specified.</p>	<p>Who: Gender assessment: at national/township/village levels with government staff, international and local NGO staff working on agriculture and food security projects, and small-scale male and female farmers and landless households. Included 212 participants (71 men and 141 women).</p> <p>Consultations: Representatives from national and international NGOs, CSOs, professional associations, and ethnic minority organizations involved in health and ethnic minority issues; 109 participants.</p>
Ayeyarwady Integrated River Basin Management Project FY15	<p>Purpose: ESMF and general project awareness.</p> <p>Format: Not specified.</p>	<p>Who: Government officials, the River Users Association, NGOs and CSOs with interests in water, environment, natural resources management and disaster risk management; international NGOs, and researchers, private sector and the media. Numbers not provided.</p>
Essential Health Services Access Project FY15	<p>Purpose: On project design issues and Community Engagement Planning Framework (CEPF).</p> <p>Format: Public Consultation Meetings.</p>	<p>Who: Representatives from national and international NGOs, CSOs, professional associations, and ethnic minority organizations involved in health and ethnic minority issues; 109 participants.</p>

Table 4 shows that across the Myanmar portfolio projects most commonly reported carrying out preparatory consultations in the form of large-scale meetings or hearings. Furthermore, the majority of projects reported that these consultation meetings were primarily focused on providing feedback to projects' ESMFs, which document adherence to safeguard requirements. The ESMF format allows projects to account for social issues that are far broader than the safeguards, but the institutional mandate still is attached only to safeguard populations.

Only the *Agricultural Development Support Project* and the *National Electrification Project* reported that they engaged in consultation activities beyond the minimum required for safeguards (a rapid gender assessment and a Poverty and Social Impact Analysis [PSIA] respectively). The project documents provide greater detail on the participant composition and consultation formats for these assessment activities than the general ESMF consultations do. Based on project reporting, these also appeared to be geared towards direct project beneficiaries rather than public meetings, which included more institutional representatives from government, civil society, and sometimes the private sector.

2.2.2 Collaboration in decision-making commitments

Collaboration in decision-making is intended to go beyond consultations that seek input and integrate citizens directly into decision-making. The CE Strategy explains that this process seeks to “make decisions more responsive to citizens’ needs and improve the sustainability of program and project outcomes through increased ownership by citizens” (Manroth et al. 2014:43). It is important to note that the language of “collaboration” and “collaborative decision-making” as conveyed in the CE Strategy is not vocabulary that project teams use in public documents to describe specific CE efforts. Projects typically continue to employ the term “consultation” in guidance documents for participatory decision-making exercises that occur throughout implementation and not only during preparation, which is the definition of consultation used in the CE Strategy and therefore employed in this analysis.

This assessment determined that a project had committed to “collaboration in decision-making” if it described intentions and/or mechanisms that went beyond solicitation of feedback and that would directly enable citizens and/or citizen organizations to be involved in decision-making processes for the project. Table 5 captures the projects in the Myanmar portfolio that include such commitments and explain what those commitments involve.

TABLE 5. Collaborative decision-making commitments, Myanmar FY15–17 (7 of 8 projects)

Project	Collaborative decision-making commitments
Southeast Asia Disaster Risk Management Project FY17	<ol style="list-style-type: none"> 1. Public meetings (in the early stages of the process) 2. "Committees" (one named “grievance redress committee”) 3. "Participatory exercises and focused discussions" (more specific mechanisms not listed) to present “ideas and suggestions as inputs into the planning and implementation of the sub-project(s)”. 4. A project-specific Communication and Consultation Plan “to ensure that community members including residents and vendors are meaningfully consulted with sufficient time before project implementation” starts. The plan must be prepared once sub-project sites are identified and, in the project’s words, “in advance of project implementation” (during official implementation phase, but before on-the-ground operations begin).

Flood and Landslide Emergency Recovery Project FY17	Listed as possible mechanisms: community meetings (to inform design, construction, maintenance), focus group discussions, participatory planning exercises; awareness-building about project with communities.
National Electrification Project FY16	<ol style="list-style-type: none"> 1. Village electrification committees (VECs): pre-existing local bodies that organize local electricity access. Project commits to building from and strengthening pre-existing committee structure to increase inclusion. 2. Implementation consultation: Public consultation at start of implementation in each participating area to educate about project, costs, recruitment in project, dangers, etc. (informing, not eliciting input).
National Community Driven Development Project FY15	<ol style="list-style-type: none"> 1. Participatory social assessments 2. Township planning and implementation committees (TPICs) 3. Village tract development plans, includes 3 stages: <ol style="list-style-type: none"> a. consolidation: prioritizes sub-projects according to villages, endorsement of village tract development plans b. endorsement—TPICs vote, endorse c. Amendment—annual review and adjustment, endorsement accordingly (this overlaps with ongoing citizen feedback).
Agricultural Development Support Project FY15	<ol style="list-style-type: none"> 4. Advisory bodies/participatory planning (particularly involving water user groups that were pre-existing local bodies involved in water access. The project commits to building and strengthening them and supporting expansion to include under-represented groups. 5. Farmer consultations and "walk throughs". 6. Participatory social assessment for each select project facilitated by third party service providers.
Ayeyarwady Integrated River Basin Management Project FY15	<ol style="list-style-type: none"> 1. Stakeholder forum (made up of members of public and private sectors, NGOs and CSOs to provide input/feedback and to engage broader communities in public consultations, in organizational hierarchy on same level as Project Management Unit (PMU), not managed by PMU. 2. Strategic environmental social assessment, which is committed to being participatory, connected with stakeholder forum. 3. Indigenous Peoples Planning Framework: for engagement with ethnic minorities. 4. General public consultation.
Essential Health Services Access Project FY15	<ol style="list-style-type: none"> 1. Village and tract health committee (VTHC): pre-existing bodies in many cases. Project will facilitate greater inclusion for women and ethnic minorities. The village committee will lead development of township health plans. 2. Citizen engagement planning framework: this will guide collaboration procedures and the township health plans structure.

Table 5 shows that six of the seven projects that included commitments to collaborative decision-making documented that they would do so by incorporating citizen-comprised/led committees into decision-making processes (the *Ayeyarwady Integrated River Basin Management Project* alternatively uses the term “forum”). The *National Electrification*, *Agricultural Development Support*, *National Community Driven Development* and *Essential Health Services Access* projects committed to working with already established village-level committees (the names of which are included in the table) in communities where they are operational.⁹ These projects also proactively acknowledged that these pre-existing community bodies can be exclusionary towards marginalized groups and so they committed to supporting expanded participation.

Where community-based groups are not present or have become defunct, these six projects planned to support the development of citizen-based advisory groups for decision-making. Only the *National Community Driven Development* project laid out specifics for group formation. As a CDD project, it follows different protocols than standard investment projects.¹⁰ In terms of granting authority, the *Ayeyarwady Integrated River Basin Management Project* committed to a level of independence for its advisory stakeholder forum and that would go beyond commitments made in all the other projects besides the *National Community Driven Development Project*. *Ayeyarwady Integrated River Basin Management Project* claimed in project documents that the Stakeholder Forum would be parallel on the organizational chart to the Project Management Unit (PMU), indicating that the two structures were meant to have the same degree of authority and therefore the forum could operate independently of project management decisions.

The *Flood and Landslide Emergency Recovery Project* did not identify committee-based citizen commitments, but it differed from the rest of the portfolio because it was an “emergency” project operating on an accelerated timeline. Nevertheless, like those projects with pre-defined committee-based partnerships, this project committed generally to “participatory planning” via community meetings but did not include any specifics about what collaboration would look like or which stakeholders would be involved.

2.2.3 Commitments to citizen feedback and monitoring opportunities throughout the project life cycle

The CE Strategy recommends that project teams solicit feedback from citizens on a vast range of issues important to project success, including “effectiveness, inclusiveness, quality, delivery time, transaction costs, and targeting, as well as on resource utilization or engagement processes” (Manroth et al. 2014:44). The CE Strategy shares examples of standard tools used for feedback collection, such as “satisfaction surveys, focus group discussions, hotlines, community scorecards, citizen report cards, or SMS/online feedback” (Manroth et al. 2014:44).

Furthermore, according to the CE Strategy, involving citizens in project monitoring “can increase transparency, improve efficiency of service delivery or budget execution, and reduce opportunities for corruption” (Manroth et al. 2014:47). As discussed in the Introduction, the Bank calls this category of CE “citizen-led monitoring”, even though the definition only calls for citizen participation and not leadership. For example, such approaches could limit citizens’ roles to atomized data-gathering, without involvement in agenda-setting. Therefore, ARC refers to this simply as citizen monitoring, given the lack of evidence that the citizens involved would actually have the opportunity to lead and make decisions about these processes.

Unlike the other sections, this one discusses two CE areas together—citizen feedback and citizen monitoring—as they are directly connected and overlapping. Both incorporate exercises that give citizens opportunities to provide feedback on project performance and service delivery. With citizen monitoring, citizens have the opportunity to go beyond the role of feedback providers and take part in gathering and interpreting that feedback. This allows beneficiaries to have access to the big picture of project performance and service provision. Consequently, even if projects commit to incorporating the same or similar CE feedback mechanisms, what separates them from one another is whether the commitment only engages the participant as a respondent or provides for expanded citizen participation as monitors. Yet, for the projects that included commitments in both these areas, they did not always clearly specify how the mechanisms that involved citizens as feedback providers would be available for citizen participation as monitors. The fuzzy

boundaries that appear to exist in some of the Myanmar projects created a logic for discussing these commitments together.

Table 6 captures the projects in the Myanmar portfolio that include commitments to collecting citizen feedback and citizen monitoring during project implementation and explain what these commitments involve.

TABLE 6. Citizen feedback and citizen monitoring commitments, Myanmar FY15–17 (7 of 8 projects and 5 of 8 projects, respectively)

Project	Citizen feedback commitments	Citizen monitoring commitments
	7 of 8 projects	5 of 8 projects
Flood and Landslide Emergency Recovery Project FY17	<p>Commitment: To periodically collect feedback on project implementation, results and grievances.</p> <p>Mechanisms: Public hearings, ICT-enabled citizen feedback platforms, GRM.</p>	<p>Commitment: To developing “channels” for community monitoring and evaluation of the construction process.</p> <p>Mechanisms: Same as column 1</p>
National Community Driven Development Project FY15	<p>Commitment: To implement “standard project accountability mechanisms (reporting and fiduciary controls) supplemented by social accountability mechanisms and instruments”.</p> <p>Mechanisms: Social audit processes, multi-stakeholder review.</p>	<p>Commitment: To develop a project accountability framework including project-led and community-led monitoring activities.</p> <p>Mechanisms: Village monitoring sub-committees (created for this role) and community facilitators; third party monitoring as check on accountability mechanisms and independent project review.</p>
Agricultural Development Support Project FY 15	<p>Commitment: A participatory M&E system so citizens can directly assess and report outstanding issues.</p> <p>Mechanism: Suggestion of stakeholder surveys.</p>	<p>Commitment: To develop a participatory M&E system (Same as column 1)</p> <p>Mechanism: Citizen-involvement facilitated by a third party service provider.</p>
Ayeyarwady Integrated River Basin Management Project FY15	<p>Commitment: To develop a community participation and stakeholder methodology.</p> <p>Mechanisms: Opinion survey, questionnaires, Stakeholder Forum, facilitated public meetings.</p>	<p>Commitment: Stakeholder Forum oversight of M&E.</p> <p>Mechanisms: Not specified beyond Stakeholder Forum involvement.</p>
Essential Health Services Access Project FY 15	<p>Commitment: To develop community feedback mechanisms to assess satisfaction with service delivery at primary care level; to build mechanisms into community health plans.</p> <p>Mechanisms: Possibilities include community scorecards, social audit, citizen report card, citizen satisfaction surveys.</p>	<p>Commitment: To build monitoring system involving consumer and civil society participation.</p> <p>Mechanisms: Same as column 1, but role of third party monitor emphasized.</p>
Southeast Asia Disaster Risk Management Project FY17	<p>Commitment: To measure citizen satisfaction.</p> <p>Mechanisms: Suggestion of satisfaction survey, specifically on resettlement process and plan.</p>	N/A

Continued

Project	Citizen feedback commitments	Citizen monitoring commitments
	7 of 8 projects	5 of 8 projects
National Electrification Project FY16	<p>Commitment: Trained village electrification committee (VEC) members are expected to assist Project Management Office (PMO) to monitor progress and provide direct feedback from the field to township engineers and PMO.</p> <p>Mechanism: Not specified.</p>	N/A

Table 6 shows that seven of the eight projects explicitly committed to incorporating mechanisms that would capture citizen feedback during and following implementation. Projects clearly framed their commitments to incorporating citizen feedback mechanisms but did so in general terms. Most of these options provided for periodic feedback uptake, based on when monitors implemented these tools. The *Flood and Landslide Emergency Recovery Project* included in its commitment the establishment of “ICT (information and communication technology) enabled citizen feedback platforms”, which would seemingly allow for ongoing citizen access (albeit dependent on community access to technology).

While the statement of commitment is clear, most projects do not offer details in public documents on how this would be carried out in practice. The *National Community Driven Development Project* is, however, an exception. With its operational manual readily available, the project details its guidelines for both periodic and ongoing citizen feedback processes. The operational manuals for the other projects may provide a similar degree of detail, but they could not be located through an internet search.

Table 6 shows that five of the eight projects also commit to going beyond providing opportunities for citizens to give feedback, documenting commitments to involve citizens in oversight roles for service delivery, revenues, budget execution, procurement, contract awards, and reform policies, etc. All five projects identify, typically in a general way, that the citizen committees already involved in collaborative decision-making would continue the project involvement in a monitoring role. The *National Community Driven Development Project* went a step further by laying out parallel project-led and citizen-monitoring processes and identifying specific monitoring sub-committees tasked with this responsibility. Beyond these descriptive commitments, it is not specified as to how citizens would operate or manage such monitoring functions as opposed to participating in social accountability mechanisms.

Three projects—*National Community Driven Development*, *Agricultural Development Support* and *Essential Health Services Access*—also committed to incorporating third party monitoring throughout the project life cycle, emphasizing the role that third party monitors would play in citizen feedback and citizen monitoring processes. This is further elaborated on in Section 2.3.2.

2.2.4 GRM commitments

As with beneficiary consultation during project design, the World Bank requires all projects that have triggered social safeguards for involuntary resettlement or indigenous peoples to incorporate a project-specific GRM (see Operational Policy/Bank Policy 4.12). According to Bank policy, this

must be accessible, free, easily understood, transparent, responsive and effective, must not restrict access to official grievance channels (such as the courts, including traditional courts), and must not cause fear of negative consequences for its recourse among users. Therefore, while all projects in a country portfolio are encouraged to include project-specific GRMs so that beneficiaries can share grievances and seek redress for adverse project experiences, projects that involve either of these social safeguards, in principle, are required to include this specific CE mechanism. This policy nuance is important to understand the GRM results in the Myanmar portfolio (Table 7).

The standard format for a GRM is that citizen complaints are filed at the community level and, if necessary, will have opportunities to escalate their grievances to higher-level authorities, with the final level being the institution of the World Bank. Program documents usually lay out general details related to the structure and time frame and some guidelines (for example, whether projects will accept oral or written complaints or both). More specific details relating to how communities can learn about a project's GRM and tangible instructions for submitting grievances and following up, for example, are often provided in the project's operational manual.

TABLE 7. GRM commitments, Myanmar FY15–17 (3 of 8 projects)

Project	Social Safeguards triggered	Commitment to create GRM	Does the GRM include a commitment to publicly report on number/percentage of grievances reported/resolved? If so, via what mechanism?
Southeast Asia Disaster Risk Management Project FY17	Yes	Yes	Yes, Results Framework indicator, which requires disclosure
National Community Driven Development Project FY15	Yes	Yes	Yes, voluntary/proactive disclosure
Flood and Landslide Emergency Recovery Project FY17	Yes	Yes	Yes, Results Framework indicator, which requires disclosure
National Electrification Project FY16	Yes	Yes	No
Agricultural Development Support Project FY15	Yes	Yes	No
Ayeyarwady Integrated River Basin Management Project FY15	Yes	Yes	No
Essential Health Services Access Project FY15	Yes	Yes	No
Total		7	3

Previous Bank experience has shown that when it comes to the implementation of GRMs—even when they are mandated for safeguards and with basic plans laid out in project documents—they do not fulfil the document-based commitments. The CE Strategy discusses this discrepancy between GRM plans and execution and emphasizes that planned disclosure of results increases the likelihood that systems will function better.

Seven of the Myanmar eight projects committed to creating a project-specific GRM, but only three commit to disclosing results. Of the three projects that included explicit commitments to disclosing GRM data, two projects—*Flood and Landslide Emergency Recovery* and *Disaster Risk Management*—included GRM results in their Results Framework, thus mandating disclosure. The *National Community Driven Development Project*, on the other hand, did not commit to measuring GRM outcomes in its Results Framework, but it did proactively commit to disclosing this data in project documents. As with other CE areas, without a commitment in project documents, there is a lower likelihood that project teams will systematically disclose this data to the public. For the two projects with GRM results as the subject of CE indicators, the commitment included tracking GRM submissions and the response/resolution rates. The way in which projects frame these CE indicators and the nature of their goals will be discussed in Section 2.2.6.

The *Agricultural Development Support Project* did not document an explicit commitment to disclosing its GRM results publicly; however, it committed to “monitoring the effectiveness” of the GRM. It pledged to incorporate dedicated indicators within project monitoring systems to the GRM and documented that: "Grievance redress monitoring indicators may include the following: (a) Number of complaints/ grievances registered. (b) Percentage of grievances resolved. (c) Percentage of grievances resolved within stipulated time period. (d) Time required to resolve complaints (disaggregated by different types of grievances). (e) Percentage of complainants satisfied with response and grievance redress process. (f) Percentage of project beneficiaries that have access to the GRM." The lack of an explicit commitment to disclose this information does not mean that the project would not share the results the M&E system captured. Disclosure plans notwithstanding, the project outlined a more comprehensive monitoring process for complaint management systems than any other project in the portfolio.

2.2.5 Capacity building for CE commitments

World Bank projects often incorporate capacity building activities related to project content and management, but activities dedicated to training on CE – for implementers or participants – are far less common. The CE Strategy therefore specifically emphasizes the importance of extending capacity-building investment to include CE-related capacity building, particularly for project teams and sectors, and in countries with limited experience of incorporating meaningful CE into development operations. It includes activities specifically designed for citizens, CSOs, communities, government officials, and national accountability institutions to strengthen their engagement and participation in project implementation (service delivery, natural resource management, public financial management, and/or CDD projects).

Table 8 shows the commitments to building capacity for CE activities in the Myanmar projects.

TABLE 8. Capacity building for CE, Myanmar FY15–17 (4 of 8 projects)

Project	Capacity-building commitments
Flood and Landslide Emergency Recovery Project FY17	Government/project implementer: CE related to safeguards and ESMF. Civil society: Based on capacity-building needs determined in the social assessment, project will develop action plan that could include CE-related mentoring, workshops, and learning-by-doing activities.
National Community Driven Development Project FY15	Local, regional, national government/project implementer/civil society/local committees: CE capacity building is a foundational element in CDD projects. Specific CE capacity-building needs were identified in a capacity-building assessment for each sector on issues related to (but not limited to) participatory processes, inclusive management, and social accountability.
Agricultural Development Support Project FY15	Local government/project implementer/third party monitor and citizen decision-makers (in water user groups): Training on project’s CE mechanisms and on relations between farmers and government.
Essential Health Services Access Project FY15	Project implementers: Training on CEPF implementation, including developing strategies to increase citizen participation. National and local organizations: Capacity-building training will be provided to organizations working in ethnic group areas.

According to Table 8, four of the eight Myanmar projects pledged to support capacity building for CE in project documents. These are the four projects that identified commitments to ongoing collaboration with citizen-composed committees (see Section 2.2.2, on collaborative decision-making). Since these citizen committees are supported to be involved in decision-making throughout the project lifecycle, capacity building focused on strengthening their soft skills of engagement as well as “hard skills” related to executing technical responsibilities. Two of the projects, *National Community Driven Development* and *Flood and Landslide Emergency Recovery*, specified that their respective CE capacity-building commitments were based on needs assessments carried out during project preparation.

2.2.6 CE indicator commitments

Results Framework is the overarching term used by the World Bank to describe the context in which results are internally measured and monitored. In practice, it includes only a small number of indicators that together are intended to explain how the project development objective (PDO) is to be achieved. What is significant is that the indicators included in a project’s Results Framework must: (1) explain how the data collected will be used over the course of project implementation; and (2) be publicly disclosed. Therefore, if the Results Framework includes an indicator on CE, the project must disclose information publicly, at least about this particular area.¹¹

As discussed in the introduction, a CE Results Framework indicator must meet one of the following criteria:

- Clearly capture citizen feedback and in so doing report “whether there is a tangible response to close the feedback loop”; or
- Monitor the extent to which citizens are involved in decision-making related to project design, implementation and oversight (World Bank 2018a).

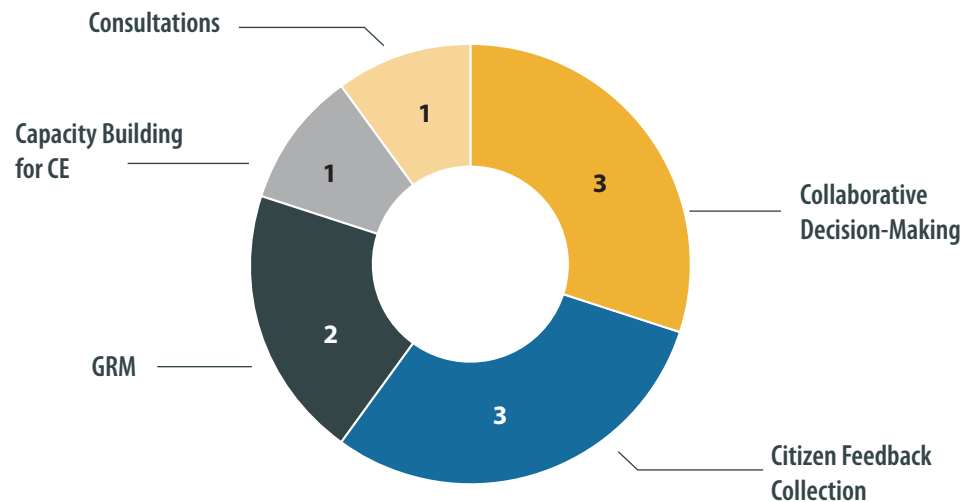
The discussion below will therefore consider these criteria when analyzing projects' CE indicators. Table 9 matches the projects with their respective CE indicator(s).

TABLE 9. CE indicator commitments, Myanmar FY15–17 (7 of 8 projects)

Project	CE area	Indicator
Southeast Asia Disaster Risk Management Project FY17	Citizen feedback	Proportion of beneficiaries satisfied with improved and maintained drainage, % of which were women (target—70%)
	GRM	% of grievances registered related to delivery of project benefits addressed (target—85%)
Financial Sector Development Project FY17	Capacity building	Capacity building for CE activities and empowering citizens (for government officials)
Flood and Landslide Emergency Recovery Project FY17	GRM	% of grievances registered related to delivery of project benefits addressed (target—95%)
National Electrification Project FY16	Consultation at the start of implementation	# of villages with at least one public consultation (on-grid target—5,300; off-grid target—3,800)
National Community Driven Development Project FY15	Collaborative decision-making	% of households in project communities participating in planning, decision-making, and implementation of sub-project (target—50%)
	Citizen feedback	% of community members satisfied with the project (target—80%)
Agricultural Development Support Project FY15	Citizen feedback	Targeted clients satisfied with advisory and agricultural services (no target # or % specified)
	Collaborative decision-making	Water user groups created and operational (target—280 in year 7)
Essential Health Services Access Project FY15 (Disbursement Linked Indicator [DLI], not Results Framework)	Collaborative decision-making	(DLI 4): Number of townships in which the township health departments have prepared an annual integrated and inclusive Township Health Plan in accordance with the Project Operational Manual and the CEPF (target—300)

Seven of the eight Myanmar projects included at least one indicator within their respective compliance-oriented Results Frameworks designed to measure an aspect of CE. Table 9 shows three trends across the portfolio. First, most projects planned to measure results for only a single CE area. However, three projects—*Disaster Risk Management*, *Agricultural Development Support* and *National Community Driven Development*—stand out because they incorporated multiple indicators to measure two different aspects of CE. This explains why there are 10 CE indicators in the portfolio, although only seven projects make commitments to measure CE progress. Second, the CE indicators cover the entire range of possible CE areas and therefore do not prioritize measuring the results of one CE area more than another.¹² The range of CE commitments that the projects pledged to measure is shown in Figure 6.

Figure 6. Classification of CE indicator categories, Myanmar FY15–17



Third, some projects measured only outputs while others measured outcomes. This last observation is key. “Outputs” capture whether a project carries out the highlighted CE activity and/or the numbers of participants, activities, etc. involved, while “outcomes” tend to capture the impact of an intervention. Therefore, output-based indicators only show that an activity took place (a key first step), but not if its CE goals were realized.

Examples of output-oriented indicators can be found in the *National Electrification*, *National Community Driven Development* and *Essential Health Services Access* projects. In the *National Electrification Project*, the CE indicator measured “the number of villages or wards where at least one public consultation is held”, emphasizing the activity of consultation by convening project beneficiaries but not conveying anything about the impact of said consultation. Therefore, the results captured by the indicator would not reveal if the project utilized consultation participants’ input to inform project implementation.

For the *National Community Driven Development* and *Essential Health Services Access* projects, the crafting of the output-based indicators offered potential for gathering more meaningful monitoring information than the *National Electrification Project*. For the *National Community Driven Development Project*, the framing of the collaborative decision-making indicator (one of the project’s two CE indicators) makes it possible to capture information beyond mere participation. It is phrased so as to capture participation in discrete components of collaboration, meaning that there would be concrete criteria to determine what qualifies as decision-making, etc. What the indicator ultimately captured would depend on how it was implemented, but that level of detail is not provided in the program documents.

The CE indicator in the *Essential Health Services Access Project* included a measure of quality even as it quantified results. It measured “the number of townships that developed community health plans” and set a benchmark that township plans must reach in order to be counted. This meant that in order to be counted a township would have to demonstrate that it met the detailed criteria

laid out in the project's operational manual and the CEPF. It is critical to recognize that the project included this as a Disbursement Linked Indicator (DLI), which means that continued disbursement of funds would be contingent upon this indicator (among others) being met. This conditionality of a DLI gives the indicator more power because its fulfillment or lack thereof has a direct impact on a project's ability to continue operations. Furthermore, DLI protocol requires that a third party independently monitors the fulfillment of these indicators, which increases the likelihood that results are impartial and accurate.

Three projects, the *National Community Driven Development* (its second indicator), *Disaster Risk Management* and *Agricultural Development Support*, committed to measuring beneficiary satisfaction. By incorporating beneficiary satisfaction indicators, these projects commit to going beyond counting outputs to measuring impacts. These projects' respective commitments for how they planned to measure satisfaction were discussed earlier, and the effectiveness and accuracy of indicators depends on the quality of the feedback gathered (in terms of questions asked, at what point in the project life cycle, etc.). Yet these indicators show the potential for capturing outcome-oriented information related to citizen voice and experience.

The CE indicators for the *Disaster Risk Management* and *Flood and Landslide Emergency Recovery* projects committed to measuring the responsiveness of their GRMs. The existence of such an indicator in the projects' Results Frameworks means that these projects will be held publicly accountable for having a functional grievance redress system. Despite high target percentages of project-related grievances being addressed in the indicators, the public documents do not provide information for key criteria, such as how "resolution" is defined, whether the projects will share raw data on submissions and resolutions, what happens in the likelihood of a percentage of complaints not being addressed, etc. Therefore, there is more to investigate regarding the meaningfulness of these indicators.

Finally, the discussion turns to the *Financial Sector Development Project*, which has not been mentioned since the Introduction given that it does not commit to incorporate any CE activities. Yet, an indicator in its Results Framework committed to capacity building (for government officials) for CE activities and empowering citizens, with no target specified. Worded ambiguously, the indicator appeared to intend to measure whether implementers' developed the capacity to hold consultations on key regulations and policies related to banks and insurance companies in a way that would empower citizens to engage more effectively with regulators. The absence of any further CE-related information or commitments in the project's publicly available documents, and the unavailability of its operational manual, makes it difficult to glean how the capacity-building program will improve CE and empower citizens. This means it will be difficult to determine whether the indicator's goals will eventually be met, even if a final project evaluation claims as such. Furthermore, because the project does not commit to involving community members at any point in its life cycle, it does not provide the space for citizen input on the kind of assistance they might need from government officials to better engage with the financial sector. Therefore, it is not clear if any capacity-building measures would actually provide the government with capabilities that would meet community needs.

As discussed in earlier sections, the *National Community Driven Development Project* is the only project in Myanmar that voluntarily committed to disclosing more CE data beyond institutional requirements. This greater level of transparency is partly because this project made its operational manual easily accessible on the internet via the World Bank and project websites. Accessing the manual allowed ARC to gather far more detailed information on the project's planned implementation than for any other project in the Myanmar FY15–17 portfolio.

2.3 Analysis of commitments to an enabling environment for CE

This research is based on ARC’s hypothesis that a project’s inclusion of CE activities is not sufficient on its own to guarantee meaningful CE and therefore an “enabling environment” is needed to facilitate and shape such engagement. Although individual projects do not have the power or influence to shape the general context in which they are implemented, they can take actions that potentially (favorably or unfavorably) contribute to an enabling environment for CE. Therefore, the overall opportunity for CE is not only determined by the existence of discrete mechanisms and activities for citizens to provide input, make decisions, be involved in monitoring, etc., but also by the circumstances in which these activities are carried out.

Although not guaranteed, projects have the potential to influence these enabling circumstances in at least three ways: (1) by fostering social inclusion; (2) by promoting accountability through incorporating independent monitoring mechanisms; and (3) by promoting transparency through disclosure of project information. The discussion below covers the assessment findings in the eight Myanmar projects across these three areas.

2.3.1 Proactive social inclusion commitments

Groups that have experienced social marginalization and exclusion could be omitted from participatory processes unless there are proactive measures to ensure their engagement. These groups include women, children and youth, people with disabilities, elderly people, and migrants. This section analyzes how and to what extent projects commit to incorporating what we call “proactive inclusion measures” within their CE processes to ensure the participation of the most vulnerable groups within beneficiary populations. Table 10 highlights the proactive inclusion measures described within Myanmar portfolio operations.

TABLE 10. Proactive social inclusion commitments, Myanmar FY15–17 (7 of 8 projects)

Project	Population group	Proactive social inclusion commitments
Flood and Landslide Emergency Recovery Project FY17	Women, ethnic minorities	Inclusion in design consultations and feedback; commitment to consult with men and women separately, also to involve ethnic minority organizations.
National Electrification Project FY16	Ethnic minorities, men, women – vulnerable, marginalized, female-headed households	Separate consultations with men and women, Collaborative decision-making (for electrification plans), gender-sensitive training for grid and off-grid electrification activities and commitment to address "gender issues". Commitment to community engagement process with screening and consultation with ethnic minorities.
National Community Driven Development Project FY15	Women, ethnic minorities and vulnerable groups	Commitment covers collaborative decision-making : <ul style="list-style-type: none"> • requirement of 50/50% for male and female representatives at the village tract committee • at least one sub-project per village tract annually to directly respond to women’s priorities • quotas for the participation of women on project sub-committees • equal pay for equal work among men and women on project-financed activities. Capacity-building commitment involves hands-on training and coaching for women’s groups. Participation of ethnic minorities in project activities.

Continued

Project	Population group	Proactive social inclusion commitments
Agricultural Development Support Project FY15	Ethnic minorities, landless women, female-headed households	<ul style="list-style-type: none"> • Commitment to go beyond inclusion of ethnic minorities per safeguard requirements. • Extension agents given training to prepare them to work with vulnerable farmers, including women and ethnic minorities. • Gender assessment was undertaken as part of design consultation undertaken to inform project design. <p>Social assessment conducted during the preparation included free, prior and informed consultations with potential project beneficiaries/affected people, including ethnic minorities.</p>
Ayeyarwady Integrated River Basin Management Project FY15	Women and ethnic minorities	<p>Collaborative decision-making: commitment to including "gender aspects" in Stakeholder Forum.</p> <p>"Efforts will be made to reach out to women in the design and implementation of activities relating to disaster warnings and agricultural advisories".</p> <p>Capacity building: tracking women's participation in CE capacity-building activities.</p> <p>Strategic Environmental and Social Assessment (SESA) will engage women and ethnic minorities and their organizations in assessment and consultation activities.</p>
Essential Health Services Access Project FY15	People with disabilities, migrants, women and ethnic minority organizations	Inclusive consultations and collaborative decision-making (community health plan creation). More details about how women's involvement would be mandated (percentage in planning processes), commitment to including organizations representing ethnic minorities.
Southeast Asia Disaster Risk Management Project FY17	Women	Gender considerations taken into account in project design. Public consultations with stakeholders (including separate meetings with women).

Ethnic minorities

According to Myanmar's 2014 Census, the country has 135 "national races" (a number contested as too low by many among Myanmar's non-Bamar ethnic minorities). When the World Bank re-engaged in Myanmar, it made the decision to consider the country's diverse ethnic minorities as indigenous peoples, which would allow it to mandate the application of the Indigenous Peoples Social Safeguard (OP/BP 4.10) when members of ethnic minorities were determined to be affected by a project. In general, decisions on which communities are accorded the status of indigenous peoples—legally as well as in relation to the implementation of foreign aid projects—goes beyond the scope of this report. However, the fact that the World Bank uses this categorization in Myanmar even though the government does not officially recognize ethnic minorities as having indigenous status means that there are higher-level mandates for engagement with ethnic minority populations in Bank projects beyond the recommendations provided by the CE Strategy.

Six of the eight projects made commitments to including ethnic minorities (and related organizations) in project activities; however, these commitments show a level of generality in most cases. For example, in the *Ayeyarwady Integrated River Basin Management Project*, the Indigenous Peoples Planning Framework (IPPF) developed as part of the ESMF with free, prior and informed

consultations with ethnic minorities, committed to providing for culturally appropriate benefits, mitigation measures and mechanisms to ensure their meaningful participation in the project. However, the project did not specify how it would accomplish this. Similarly, ethnic minorities were consulted during the preparation of the IPPF for the *Agricultural Development Support Project*, which pledged to safeguard their interests and committed to ethnic screening and social assessment, where relevant, as part of the feasibility study for each proposed scheme under the project. The remaining four projects mentioned the inclusion and involvement of ethnic minorities in consultations and during project implementation, without giving further details.

Women (gender)

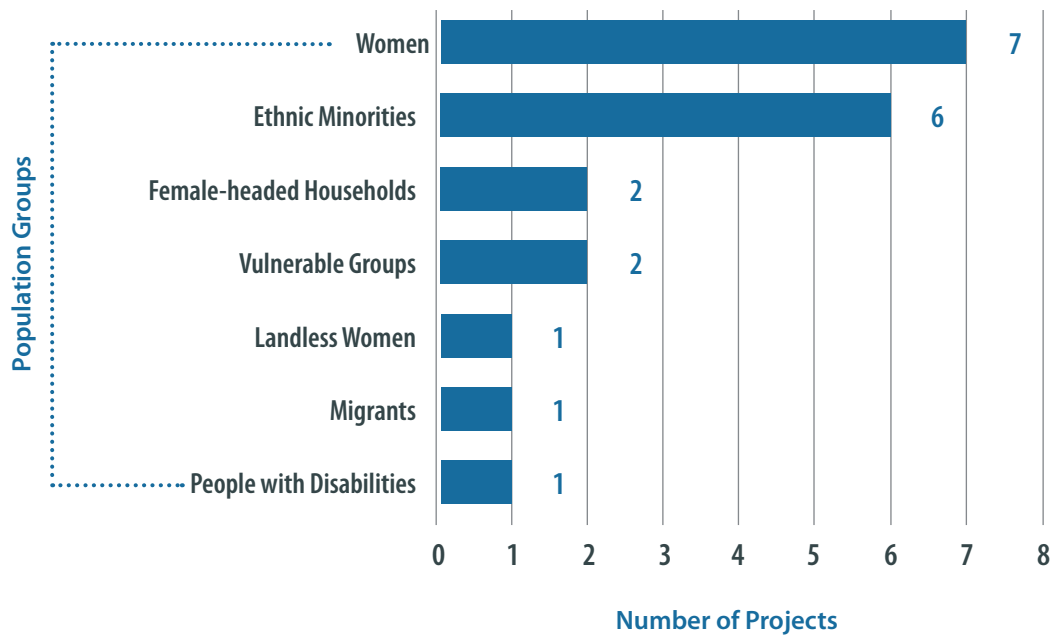
Women were prioritized in seven of the eight assessed projects in the Myanmar portfolio. Commitments to including women ranged from separate consultations in a majority of projects, collaboration in decision-making processes (four projects), and training and capacity building for women beneficiaries. The commitments were more detailed than those pertaining to ethnic minorities. For example, the *Ayeyarwady Integrated River Basin Management Project* committed to integrating gender concerns to promote equity and leverage the positive impacts of the project by: (1) including women in key assessment and planning exercises, including the Master Plan and the SESA; (2) integrating gender aspects in the implementation of the Stakeholder Forum and all communications and outreach activities, including the dissemination of disaster warnings and agricultural advisories; and (3) ensuring that female staff of relevant agencies and communities have equal opportunity to participate in the capacity-building and training subcomponents of the project.

In another case, the design and implementation of the *Disaster Risk Management* project took into consideration the fact that men and women often have different perceptions of risks, take on different roles in emergencies and disaster preparedness, and face different impacts. Thus, the project committed to: (1) seek employment with equal pay and gender-responsive physical design in standard contract bidding documents; (2) raise awareness among contractors on gender-sensitive employment practices and hiring of women; and (3) tailor disaster risk management awareness training to be gender-specific.

Other groups

Several projects also made brief commitments (without specifics) to include people with disabilities, migrants, female-headed households, landless women, and other vulnerable groups. The *Flood and Landslide Emergency Recovery Project* committed to generating positive benefits for disaster-affected people, including the poor, women and vulnerable people, in the form of improved access to critical infrastructure and services as well as direct income support. The *National Electrification Project* committed to benefitting socially excluded groups, such as low-income and female-headed households, people with disabilities, students, and people of different ethnic groups and religious beliefs. In the case of the *Essential Health Services Access Project*, the CEPF laid out commitments to proactively including representatives of vulnerable groups in the township health planning process. However, these commitments were extremely general, raising questions about the actual role and involvement of these groups would have during implementation.

Figure 7. Proactive social inclusion commitments by population groups, Myanmar FY15–17



2.3.2 Commitments to third party monitoring

The World Bank defines third party monitoring as “monitoring by parties that are external to the project or program’s direct beneficiary chain or management structure” (Van Wicklin and Gurkan 2013:2). It recommends that projects incorporate third party monitoring in order “to provide an independent perspective on project or government performance” (Van Wicklin and Gurkan 2013:2). It is because of the anticipated independence of these external monitoring entities that the incorporation of third party monitoring can potentially contribute to an enabling environment for CE.

The ARC assessment tool identifies first whether a project commits to incorporating an external “third party” monitoring entity (professional or community-based). If so, the assessment then ascertains the purpose for which the entity has been recruited (i.e., monitoring safeguard compliance, impact evaluation, collection of citizen feedback, etc.) and whether there is a documented intention to share findings with the public. These three steps are collectively considered to determine the potential contribution of “third party” monitoring to an enabling environment.

The assessment revealed that projects commit to third party monitoring for a range of different activities and mechanisms. While some projects include a single commitment to third party monitoring in just one area, others include multiple commitments to third party monitoring across several areas during the project life cycle. The assessment identified five broad categories for which World Bank-supported operations utilize third party monitoring, as follows:

- (i) **Social safeguard compliance** for projects that have been determined to involve, or have the potential to involve, resettlement and/or Indigenous Peoples.

- (ii) **Project M&E** of general project processes, results and outcomes to accompany the project monitoring undertaken by project management units (PMUs).
- (iii) **Disbursement Linked Indicator (DLI) Monitoring.** DLIs are project indicators whose achievement triggers the release of a new tranche of funds to continue project implementation. These are utilized by projects to incentivize the achievement of key program milestones and improve performance. Since funding provision is linked directly with goal achievement, the World Bank requires that these indicators be monitored by external entities. Therefore, projects that incorporate DLIs rather than traditional project indicators are required to contract third party monitoring.
- (iv) **CE activity monitoring** involves the external monitoring of CE project activities and mechanisms, designed to provide affected peoples with opportunities to provide feedback, make decisions, submit complaints (i.e., management of a project-level GRM by an entity separate from the PMU or the client government).
- (v) **Impact Evaluation** to determine whether the changes in outcomes can be attributed to the World Bank-supported project that was implemented.

An overview of project commitments across these five categories in Myanmar is highlighted in Table 11.

TABLE 11. Third party monitoring commitments by type, Myanmar FY15–17 (5 of 8 projects)

Project	Safeguard compliance	Disbursement Linked Indicators (DLI) monitoring	Project M&E (process and/or outcomes)	CE monitoring	Impact Evaluation	Proactive information disclosure
National Electrification Project FY15						
National Community Driven Development Project FY15						
Essential Health Services Access Project FY15						
Agricultural Development Support Project FY15						
Flood and Landslide Emergency Recovery Project FY17						
TOTAL	5	1	5	3	1	3

As Table 11 shows, five of Myanmar’s eight assessed projects committed to some form of third party monitoring, involving more than one category in all cases. All five projects committed to external monitoring of procedures related to compliance with Involuntary Resettlement and/or Indigenous Peoples safeguards. External monitoring of project-related activities (project progress, implementation, quality control, and similar aspects related to its process and/or results) represented the most frequently cited category (5 of 8 projects) besides safeguards monitoring. The *Essential Health Services Access Project* was the only project that incorporated commitments across four of the five categories of external monitoring. It also involved DLIs, which are monitored by third parties to ensure further disbursement of loans. A little under half of the portfolio (38 percent, or three of the eight projects) committed to utilizing third party monitors for CE activities, and one project committed to external monitoring for an impact evaluation. The third party monitoring commitments across the various categories are described in more detail in Table 12.

TABLE 12. Third party monitoring commitments, Myanmar FY15–17 (5 of 8 projects)

Project	Category	Third party monitoring commitments
National Electrification Project FY15	Safeguards, project monitoring, CE monitoring	To assure quality in installations in the field, a portion of installed off-grid systems are randomly selected for verification and inspection by the Department of Rural Development or a qualified third party. To mitigate potential risk of equity, transparency and accountability, the project will embrace a broad-based and inclusive community-based planning process ahead of sub-project implementation at village level. Regular and transparent monitoring will include third party monitoring with community involvement. Audits will provide an independent periodic review of all aspects of the program to ensure that it is operating as designed, efficiently, corruption-free, and is deployed at sufficient scale to meet targets.
National Community Driven Development Project FY15	Safeguards, project monitoring, CE monitoring	<p>The proposed independent third party monitoring process will act as a check on project/social accountability mechanisms, and provide an independent review/snapshot of project processes and outcomes, with a focus on high-risks townships. Lessons learned will be shared with a broad set of stakeholders, including the Department for Rural Development, the World Bank and civil society observers. It will oversee:</p> <ul style="list-style-type: none"> • Stakeholder selection and behavior (process): performance of project sub-committees; • Participation, decision-making and feedback (process): inclusion, role of women and other vulnerable groups in project decision-making and implementation; • Grievance reporting mechanism; • Transparency and communication (process); • Utilization and satisfaction to provide a check on outcomes to ensure that the sub-projects are functioning, being utilized as intended, and are benefiting intended beneficiaries, including women and vulnerable groups. <p>This component will also finance M&E of project activities at village and township levels in beneficiary townships utilizing quantitative and qualitative survey methods.</p>

Continued

Project	Category	Third party monitoring commitments
Essential Health Services Access Project FY15	Safeguards, DLI, project monitoring, CE monitoring	The project M&E system will include an independent verification mechanism by a third party, to assess progress on DLIs and compliance with the operational manual—done annually—of the results achieved. Ministry of Health will contract an international firm to carry out an independent sample-based survey of filled checklists by the township and state teams to verify the veracity of the results. For compliance verification procedure, an independent assessor may review all the township reports and visit randomly selected townships and health facilities at village level, ensuring that the guidelines, essential supplies and skills are readily available.
Agricultural Development Support Project FY15	Safeguards, project monitoring, impact evaluation	Regular monitoring by the project implementation unit will be complemented by annual rapid assessments conducted in partnership with public research institute(s) or independent consultants. In addition, independent impact evaluations will be carried out 3 times during the project implementation.
Flood and Landslide Emergency Recovery Project FY17	Safeguards, project monitoring	Independent third party monitoring will be considered for activities in Rakhine state. During project monitoring, feedback will be collected from beneficiaries on project implementation and results, and how grievances in relation to implementation are addressed.

Three of the five projects that committed to incorporating third party monitoring throughout the project life cycle focused on the role that third party monitors were supposed to play in citizen feedback and citizen monitoring processes. For example, the *National Community Driven Development Project* stated that an independent monitor would provide independent review of monitoring and social accountability processes.

Where third party monitoring is combined with an explicit commitment to timely, proactive disclosure of reliable, relevant and actionable findings, third party monitoring can contribute to informed CE. Of the projects that committed to include third party monitoring, three also committed to some degree of public disclosure (Table 11). This critical link between independent monitoring and proactive information disclosure is discussed in more depth in section 2.3.3.

2.3.3 Commitments to proactive information disclosure

Proactive information disclosure entails letting the public know not just about the mere existence of a project but about its ongoing progress and outcomes. This EE indicator therefore measures whether a World Bank project proactively releases results to the public, including those from CE efforts, over and above Bank-mandated minimal requirements pertaining to social safeguards or Results Framework indicators.¹³ In other words, this indicator seeks to determine if a project commits to “reporting out” its progress and results to the public rather than only “reporting up” to Bank officials and, if so, the ways in which it commits to doing so. This is a crucial aspect of the enabling environment for CE because the capacity of project-affected peoples to shape a project increases when they are accurately and appropriately informed about implementation progress and achievement.

Three of the eight Myanmar projects committed to proactive disclosure related to at least one aspect of the project. Table 13 captures the details of these commitments.

TABLE 13. Proactive information disclosure, Myanmar FY15–17 (3 of 8 projects)

Project	Proactive information disclosure commitments
<p>Agricultural Development Support Project FY15</p>	<ol style="list-style-type: none"> 1. ESMF mentions that the project webpage will have a dedicated section where safeguard supervision monitoring reports to be prepared by the Project Implementation Committee focal points and the results of participatory M&E will be disclosed. <p>Mechanism: Website disclosure</p> <ol style="list-style-type: none"> 2. Results of participatory social assessment will be made available to stakeholders and affected people in accessible locations and user-friendly language. <p>Mechanism: Not specified</p>
<p>National Community Driven Development Project FY15</p>	<ol style="list-style-type: none"> 1. The operational manual commits that key project documents will be disclosed publicly, including but not limited to findings of the financial, technical and social audits, procurement documents, as well as others. The project’s website, www.cdd.drdmyanmar.org, is the key place for disclosing project-related documents that are also made publicly available in the participating communities, as feasible. 2. The village tract development plans will be developed based on the results of a participatory social assessment and will be disclosed in all affected local communities in language they understand. 3. Lessons learned from independent third party monitoring will be shared with a broad set of stakeholders, including the Department for Rural Development, the World Bank and civil society observers. 4. The project also commits to voluntarily disclose GRM data. <p>Mechanisms: Various</p>
<p>Essential Health Services Access Project FY15</p>	<p>The CEPF commits to developing a communication strategy to improve care-seeking behaviors and increase project transparency and accountability. Information dissemination commitments include:</p> <ol style="list-style-type: none"> 1. Disseminating township health plans to stakeholders and communities. 2. Developing a health financing strategy and an Essential Package of Health Services (EPHS), including quality standards that will be publicly communicated. <p>Mechanism: Communication strategy</p>

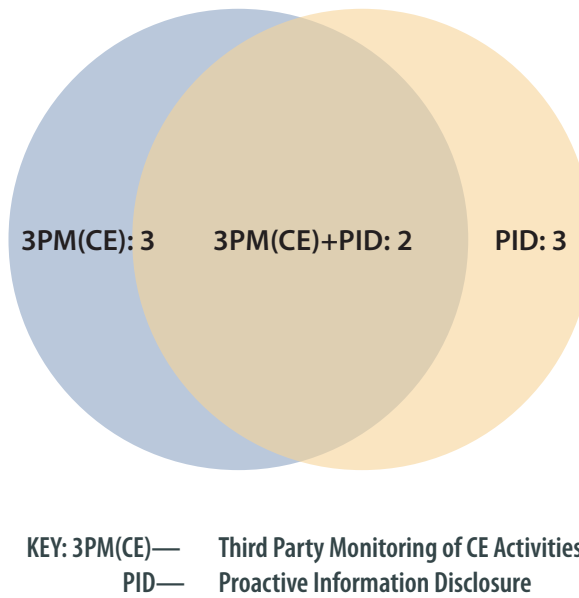
Third party monitoring for CE activities and public information disclosure

Given the importance of public access to accurate and timely project implementation information for fostering a conducive environment for CE, the research examined whether and how projects planned to disclose information about the World Bank-prioritized CE activities and other enabling environment indicators. Significant for each of these areas, public disclosure has particular value for results collected by entities external to, and potentially independent from, project management. ARC’s guiding hypothesis is that in projects where third party monitoring results are made public, this helps to advance a conducive or enabling environment by encouraging public accountability and transparency in project operations. As a result, these two areas are complementary and mutually reinforcing in creating an enabling environment for citizen engagement.

This assessment therefore delves further into the intersection of third party monitoring of CE activities and proactive disclosure commitments within projects across the Myanmar portfolio, and Figure 8 depicts the relationship between the two. In the Myanmar portfolio, all three of the projects with proactive disclosure commitments also committed to utilizing third party monitoring,

although not necessarily for the same activities. However, only two of these projects specified that they would disclose results from third party monitoring of CE activities as part of a project-related information disclosure plan (see Figure 8 and Table 14).

Figure 8. Intersection of third party monitoring for CE and proactive information disclosure commitments, Myanmar FY15–17 (2 of 8 projects)



In Figure 8, the blue circle denotes the number of projects committing to third party monitoring of CE activities and the pink circle denotes proactive disclosure of project information. The overlapping circles depict the number of projects in Myanmar that committed to both third party monitoring and proactive disclosure of information. Table 14 highlights the relevant project commitments made by these two projects.

TABLE 14. Project commitments to third party monitoring for CE and proactive information disclosure, Myanmar FY15–17 (2 of 8 projects)

Project	Third party monitoring of CE	Proactive information disclosure
<p>National Community Driven Development Project FY15</p>	<p>The proposed independent third party monitoring process will oversee project/social accountability mechanisms, and provide an independent review of project processes and outcomes, with a focus on high-risk townships on:</p> <ul style="list-style-type: none"> • Stakeholder selection and behavior (process) • Participation, decision-making and feedback (process): inclusion, role of women and other vulnerable groups in project decision-making and implementation; • Grievance reporting mechanism; • Transparency and communication (process); • Utilization and satisfaction to provide a check on outcomes to ensure that the sub-projects are functioning and benefiting intended beneficiaries, including women and vulnerable groups. 	<p>The operational manual commits to publicly disclosing key project documents including (but not limited to) findings of the financial, technical and social audits, procurement documents, as well as others on www.cdd.drdmyanmar.org and in the participating communities, as feasible.</p> <p>The village tract development plans, which will be developed based on the result of a participatory social assessment and will be disclosed in all affected local communities in a language understandable to them.</p> <p>Lessons learned from independent third party monitoring will be shared with a broad set of stakeholders, including the Department for Rural Development, the World Bank and civil society observers.</p>
<p>Essential Health Services Access Project FY15</p>	<p>Ministry of Health will carry out an independent sample-based survey of filled checklists by the township and state teams to verify the veracity of the results. For compliance verification procedure – an independent assessor – may review all the township reports and visit randomly selected townships and health facilities at village level, ensuring that the guidelines, essential supplies and skills are readily available.</p>	<p>Ministry of Health will disseminate township health plans to township stakeholders and communities.</p>

III. Project Design Conclusions

This report provides insights into whether and how the World Bank incorporated CE commitments into the project design of FY15–17 projects in Myanmar. The findings are as follows:

The CE Density Scale for Myanmar reveals that most Myanmar projects committed to create space for CE and to open opportunities for communities to claim accountability. Half of the portfolio qualifies as *Robust*—the highest category on the CE Scale, with three of these four projects planning for all 10 of the World Bank’s prioritized CE areas and the 3 ARC-identified measures that potentially facilitate an enabling environment for CE. The remaining projects are split between two categories of the CE Density Scale, *Intermediate* and *Low*. Three of the four projects rank in the mid-level category *Intermediate*, documenting at least one EE and five CE commitments. Only one project ranks in the bottom-most category, *Low*, falling short of the Bank’s minimum institutional CE requirements.

The CE Density Scale results reveal that projects with greater commitments to CE mechanisms also include more commitments to investing in strengthening the enabling environment for CE. At the highest level of the scale, three projects committed to the seven CE and the three EE categories. The commitments then steadily decline across the CE and EE categories in subsequent projects, ending with a project in the bottom-most category having only one CE and no EE commitment. This CE trend potentially shows the recognition among certain project teams that for planned CE efforts to have an actual impact on project execution, they need to take place in an inclusive and transparent environment that would allow citizen input to influence ongoing project decisions and actions. However, the degree of efficacy of this realization can only be confirmed by investigating project implementation.

All but one Myanmar project committed to a wide range of CE activities throughout project duration. Seven of the eight assessed projects committed to undertaking community consultations to build project awareness, meet social safeguards requirements, and as part of Environmental and Social Management Framework (ESMF) preparation. They also committed to engaging citizens in decision-making roles, soliciting their feedback during implementation, creating a project-level GRM, and including at least one indicator in the public monitoring system (Results Framework).

Citizen monitoring and capacity building for CE are the two most under-represented CE mechanisms in the Myanmar portfolio. Commitments to citizen monitoring and CE capacity building were found in five and four of the eight assessed projects, respectively, with very little specificity or details, making these the least represented among the seven World Bank-prioritized CE areas.

Seven of the eight projects in the Myanmar portfolio committed to measuring at least one aspect of CE through an indicator in their Results Frameworks. Three projects went beyond the minimum institutional requirement and included two CE indicators. The 10 CE indicators found across these 8 projects intended to measure various aspects of CE, such as community consultations, collaborative decision-making, citizen feedback collection, CE capacity building, and GRM

effectiveness. Only the *Ayeyarwady Integrated River Basin Management Project* omitted any indicator to measure CE progress, thereby failing to meet the second requirement of the Bank-wide CE mandated minimums.

All but one project committed to adopting measures to proactively address gender inclusion, with far more limited attention to other dimensions of social inclusion. Seven projects made detailed commitments to including women and enhancing their role in a range of CE activities. Six of the eight projects applied the Bank's indigenous peoples safeguard policy and, to meet the requirements of the policy, included provisions for facilitating the participation of ethnic minorities. However, these commitments were general and far less robust than those relating to women. Beyond this, few projects made commensurate commitments to proactively include other socially excluded groups (i.e., migrants, people with disabilities, people living in poverty, youth, the elderly and landless people). Thus, the positive findings on proactive social inclusion in the Myanmar portfolio primarily speak to comprehensive attention to women (gender), but not to other vulnerable groups.

Only three of the eight projects committed to providing the public with results from third party monitors. Of these, only two committed to specifically undertaking third party monitoring of CE activities and disclosing these results. These areas are complementary because independent monitoring is likely to produce more objective results and if citizens have timely access to this, they can be more accurately informed when providing input to projects. Yet given that less than half of Myanmar projects committed to publicly sharing third party monitoring results, the citizenry is less likely to be well enough equipped to hold projects to account.

The content of project commitments to CE were so general in many cases that it created the risk that implementation would be incomplete or inadequate. The extent of the commitments in the Myanmar portfolio, as described in publicly available documents, was encouraging. However, the lack of publicly available detailed plans for how such commitments would be carried out leads to concerns that the promises may not ultimately translate into practice. The project examples analyzed show that 'ticking the box' for a CE activity does not guarantee that the commitment will be fulfilled in a way that meaningfully contributes to the project.

IV. Fieldwork Findings and Lessons Learned

The generality found in the desk review of the FY15-17 Myanmar portfolio underscores why it is essential to also undertake fieldwork if one endeavors to know how CE is actually being carried out within World Bank projects. As explained in the methodology section (1.3.4) the Myanmar fieldwork focused on three projects, all approved in FY15. These included: Additional Financing for the *National Community Driven Development*, *Ayeyarwady Integrated River Basin Management* and *Essential Health Services Access* projects.

The fieldwork findings are organized according to the themes and issue areas identified by the researchers.

4.1 Public awareness of CE commitments

As described in the Bank's CE Strategy, access to information is one of the necessary enabling conditions for effective CE (Manroth et al. 2014:8). Therefore the team investigated the extent to which project-affected individuals had access to basic project information, whether the information had been made available in Burmese and national languages, and if they understood the nature of the project's CE commitments.

As part of this, the team specifically investigated whether and how projects made their operational manuals available to the public. When operational manuals are made public and in national languages beyond English, this resource can uniquely serve as a central source of information about how a project plans to operationalize commitments, including those for CE. It is important to note that the World Bank's public information disclosure policy does not apply to operational manuals and thus it is not mandatory for projects to share this vital document publicly. Government officials in charge of project implementation determine whether and how its operational manual is released.

This research revealed the following:

The *National Community Driven Development Project* publicized the range of CE mechanisms planned for implementation through its operational manual, made available on the World Bank and Department of Rural Development's websites in Burmese and English. This research found that among the three projects investigated, this was the only one to proactively make its operational manual publicly available. In addition, this project touted its operational manual as a "living document" that received ongoing updates based on learning from implementation experience, including citizen feedback.

Participant communities incorporate this CE information (along with other project guidance) into their community- and sub-project-specific manuals, which adapts the overarching operational guidance to fit the range of cultural and linguistic needs. Some community members consulted, mostly those in leadership roles, noted having learned about the project directly from the operational manual. Most community members interviewed however were not aware of the existence

of an operational manual or its accessibility. However, they shared that they learned about overall project details and its CE opportunities in particular from particular sub-project guides.

The research found that the project promoted CE opportunities through targeted, sponsored activities, including awareness raising events, and by distributing printed materials (i.e., posters/billboards, printed backpacks and T-shirts, and broadcast media). The implementing ministry, the Department of Rural Development, also established ongoing communication with participating communities through an active Facebook page, project website, and media. Examples of broadcast media included a short video in Burmese that explained the sub-project cycle, televised sessions of township selection, and frequent TV and radio interviews to respond to public questions. World Bank staff interviewed for this research described hosting field visits for interested NGOs from areas not yet participating.

The *Essential Health Services Access Project* developed a Community Engagement Planning Framework (CEPF)—the only one in the portfolio—aiming to guide a bottom-up participatory process for providing input into the highly centralized health system, through the creation of community health plans. The CEPF only generally described its plans for engaging citizens, promising that the operational manual would lay out the action plan for carrying out these commitments. However, this research did not find the manual to be publicly available. Web searches did not yield any results and the range of respondents interviewed were not aware of plans for making it public. Several government health workers interviewed recounted that the Health Ministry had made a limited number of hard copies, in both English and Burmese, available to some officials at the township level. However, as far as these respondents were aware, there was no requirement for the officials privy to the operational manual to share the documents with health workers carrying out the project at the community level. This decreases the likelihood that midwives, who have the main project responsibility for organizing communities to develop participatory health plans, would have seen it and would know the commitments for community engagement.¹⁴

Respondents explained that the decisions for how the project would launch public information and awareness campaigns in different sub-national areas across the country, as well as publicize opportunities for participation, depended on the initiative of individual health ministry staff. However, they claimed that staff lack of will or interest was not in fact the main obstacle. Instead funding limitations and time restrictions (in the context of other mandated responsibilities) were the main culprits. According to some stakeholders, the project provided more extensive community outreach when international NGOs, such as Save the Children, supplemented the Health Ministry's funding allocation for the project.

For the *Ayeyarwady Integrated River Basin Management Project*, respondents shared that the project had held information sessions to educate affected communities about project plans. They reported that they were primarily held in larger cities in the vicinity of the implementation sites (i.e. Mandalay) or in the nation's Capital, Yangon, which most community members could not easily access for a short meeting.

However, even when the project sponsored public information sessions, respondents complained that the presentations left inadequate time for in-depth question and answer from those attending. As well, the information provided would not sufficient for communities to grasp this highly complex and technical project. Furthermore, when attendees could access project documents, they almost always were exclusively in English and rarely shared with sufficient advance notice so attendees could prepare themselves. Respondents claimed that even the institutionally required ESMF had not been made public in Burmese. Furthermore, interviewees from affected

communities and civil society organizations (including IFI Watch) reported that the project's operational manual was not publicly accessible via the Bank or project websites. Most did not know that such a document existed, and those who did said they did not know how one could access it.

The research team asked community members what they knew about the kinds of commitments the project had made to engage communities and most importantly if they knew about the project's Stakeholder Forum, a project-created entity intended to include community representatives and designed to function as an advisory and intermediary body between project management and affected peoples. Most respondents, including CSO representatives who had been closely following this project, were quite surprised to learn about this decision-making body and that community members were meant to have a role. Stakeholder Forum related findings will be discussed further in section 4.3.

4.2 Funding for CE

The CE Strategy recognizes that, historically, limited dedicated funding for CE has been a barrier to carrying out commitments in World Bank-supported projects (Manroth et al. 2014:18). Experience has shown that when an operation specifically allocates funds for CE within the project budget, this significantly increases the likelihood that CE will be carried out as planned (Manroth et al. 2014:63). Stakeholders interviewed in Myanmar, including project staff and members of partner organizations involved in project implementation, echoed these conclusions. They said that their budgets rarely had funds allocated for solely CE work and therefore constrained budgets usually were allocated first to other priorities, leaving planned CE activities unfunded.

The *National Community Driven Development Project* made public its detailed funding allocations for the range of CE mechanisms promised in project design, most notably in its operational manual. Even so, some stakeholders interviewed complained that in some cases the project had not allocated adequate resources to carry out the full scope of promised CE activities. Most often capacity building for CE would be the most underfunded CE category and therefore not all intended activities could be carried out.

The *Essential Health Services Project* laid out an ambitious CE agenda in its CEPF, but without an accompanying budget for the range of promised activities. Health officials interviewed involved in project implementation reported that overall, the project would not provide them with enough funds to cover all the activities for which they had responsibility. Given those conditions, they would first allocate the available funds to implementation needs considered highest priority and if this did not leave enough funds for planned CE activities, they would not be carried out.

Ayeyarwady Integrated River Basin Management Project program documents assert that citizen participation would be an integral part of its design and published that US\$1 million had been allocated for CE. This is notable because few World Bank projects specify a budget for CE in public program documents. A World Bank staff member interviewed in relation to the *Ayeyarwady Integrated River Basin Management Project* said that since CE is a central part of the project design, funds were being allocated accordingly. However, community members interviewed said that their experience to date did not show a well-funded CE program. While they were heartened to learn that the project had allocated US\$1 million, and that the Bank had publicized this figure, they remained worried that commitments would not ultimately be fulfilled.

4.3 Collaboration in project decision-making and collecting citizen feedback

In the World Bank CE strategy, the category of “collaboration in decision-making” goes beyond consultations and feedback collection by integrating citizens directly into decision-making processes. The stated goal of offering this kind of CE opportunity is to make project decisions more responsive to citizens’ needs and improve program sustainability and outcomes by increasing citizens’ feeling of ownership (Manroth et al. 2014:42). On the other hand, “citizen feedback collection” CE activities encompass actions to solicit and collect citizen/beneficiary input during and after implementation on different dimensions of provided services. All three investigated projects committed in project documents to providing some opportunities for community members to collaborate on project decisions and to collecting citizen feedback at project intervals when the feedback, in theory, could influence upcoming implementation.

In the *National Community Driven Development Project*, village development committees (VDCs) are the bedrock mechanism for direct citizen collaboration in project decision-making. The fieldwork showed that the project provided these citizen committees with decision-making capabilities in practice that align with the commitments made in project documents. Notably, the project also implemented proactive inclusion measures to enable women’s equal participation. In the communities visited for this research, respondents (men and women) said that the project proactively created space for women in decision-making forums and other participation opportunities. However, interviews with project managers who worked in areas not visited as part of the fieldwork shared that in some cases communities could not reach the required 50 percent threshold for women’s participation in decision-making meetings. According to these interviewees, because of pressure to remain on schedule, decision-making would proceed without having achieved the required gender representation.

The research showed that communities did not always fully understand the parameters for and limits to their decision-making power. In one village visited during the fieldwork, the VDC worked together to establish three priorities. In descending order of importance, (1) procure access to clean drinking water, (2) rehabilitate the road to the village cemetery, and (3) build a community hall. However, after coming to this decision they learned that the top two priorities did not fit into the menu of options that the project would allow and therefore they would be disqualified. Therefore, the VDC had no choice but to construct the community hall. The fact that the community could not utilize the project to realize their most urgent development goals led some community members to question if decision-making was really participatory.

The *Essential Health Services Access Project* aimed to improve health planning at the most local level in Myanmar (i.e., sub-centers and rural health centers). To accomplish this without creating parallel structures that potentially would be discontinued after the project ended, the project planned to utilize already existing country systems, which in Myanmar includes village health committees (VHCs) established at the township and village levels. However, while in theory VHCs were meant to exist across the country, the reality in Myanmar is that small and remote villages did not have functioning VHCs that the project could readily partner with, as envisioned in project documents.

During interviews, local-level government staff explained that the collaborative consultation to which the project committed did not take place consistently. The project was most likely to fulfill the inclusivity criteria laid out in the CEPF at the township level, where health ministry staff could organize diverse participatory committees to develop health plans. However, this often did not extend to the village level. Respondents cited limited financial resources, time, access, and

capacity, including lack of pre-established or operational VHCs, as the reasons for village-level planning processes falling short of participation outlined in the project documents. In some cases, participatory planning did not appear to have taken place at all. This has meant that in practice, primary health care staff such as midwives, who work directly with communities at village level and who are the primary implementers of the *Essential Health Services Access Project*, are far less likely to have a voice in the health planning process.

Health staff interviewed questioned whether any of the township-level participatory processes and collected feedback ultimately had an impact on the final policy and planning decisions made by Ministry officials. For example, these interviewees expressed concern that the Township Medical Officers would make changes to participatory results based on their own priorities, therefore preventing the community feedback and priorities from reaching decision-makers in the health ministry.

The *Ayeyarwady Integrated River Basin Management Project* fieldwork revealed discrepancies between what the World Bank claimed to do and what community members recounted. Project planning documents showed commitments to having a Stakeholder Forum that would advise key project decisions and would act as a bridge between project management (the Project Implementation Unit, the government, and the World Bank) and beneficiary communities. Interviewed community representatives and involved CSOs did not know of the Forum's existence, although the Bank said it had been created and the government had responsibility for "populating" it.

Community members in the areas of implementation consistently expressed their belief that the project had been exclusionary when choosing villages and individuals to participate in consultations. During fieldwork in a village within Pakokku Township, focus group attendees complained that no one in their community had been invited to consult on the project, even though their village is located only 100 meters away from another village that had been included. They reported that they believed community members consulted were not those who lived directly on the river and who would be most affected by the project.

Several respondents from Mandalay reported that they participated in a full-day consultation workshop about the project. They admitted that they agreed to participate despite feeling skeptical about how seriously their input would be considered and reported that they believed the event was performative and that their perspectives were not taken seriously.

After feeling ignored and excluded, a self-organized network of Mandalay CSOs attended one World Bank-sponsored information sharing event and "occupied" the meeting when it started by standing up and reading aloud from a prepared open letter with their critiques and concerns. They explained they felt like they had no other choice than to take over the space because they did not believe they would have been granted the time or space to share their concerns otherwise. An excerpt from the letter (translated from Burmese by Htun) states that "despite the project proposal's commitments ... the consultation process for the project violates the procedures which must be followed. None of the information to be discussed during the consultation has been shared beforehand, there has not been enough time allocated to have substantive discussions during the consultation, and most notably, there was no information provided about the participants who [supposedly] were representing the communities."¹⁵

Even with all these critiques, there was evidence that civil society advocacy, particularly from Mandalay, had influenced project implementation. For example, community protest led the

project to abandon initial plans for mini-dam construction. However, interviewees emphasized that their ability to effect such a change came from rigorous self-initiated activism and not because of their participation in the project's pre-planned CE mechanisms.

4.4 Grievance redress mechanism

As defined by the World Bank, grievance redress mechanisms (GRMs), also called complaints-handling mechanisms, are intended to provide a system through which queries or clarifications about the project are responded to, problems with implementation are resolved, and complaints and grievances are addressed efficiently and effectively (Manroth et al. 2014:66). For the period of Bank operations investigated, GRMs were mandatory for projects that triggered certain safeguards. However, Bank monitoring has shown that a large percentage of projects that commit to GRMs in design (whether mandated by safeguards or not) do not carry them out in practice. In cases where they are implemented, a high percentage do not function well (Manroth et al. 2014:3,45).

National Community Driven Development Project

Of the three investigated projects, all of which committed to implementing a GRM during project implementation, only the *National Community Driven Development Project* could demonstrate an active, operational GRM. The project's operational GRM introduces systems and procedures for submitting complaints and other feedback, which are strictly linked with project operations. The fieldwork showed that the processes were not tied into ongoing governance structures, so the systems would likely cease to function with the end of the project. Furthermore, the project actively encouraged communities to submit praise in addition to complaints to the GRM. This use of the GRM to receive positive feedback in addition to complaints, therefore making it more of a mechanism to process general feedback rather than one dedicated to investigating and resolving complaints, makes it difficult to evaluate how in practice the system functioned for the resolution of project grievances.

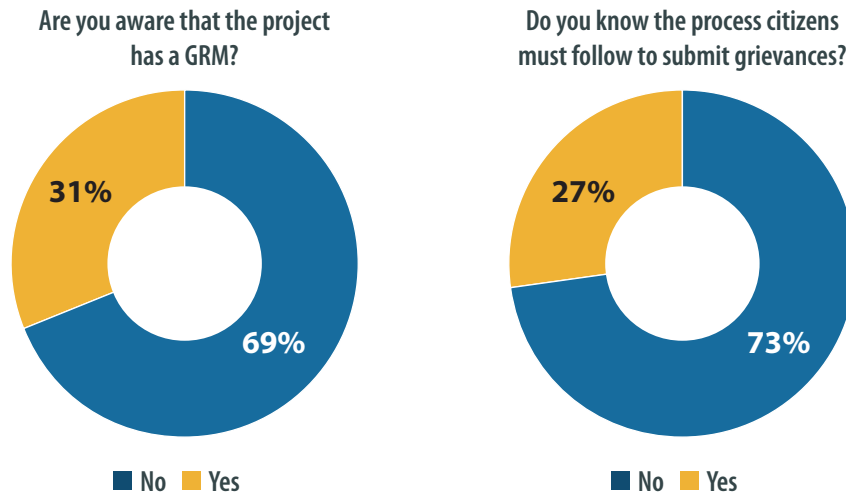
The project focused its citizen engagement Results on CE mechanisms other than the GRM and therefore did not have a commitment to publicly disclose information about complaints and their resolution. Yet the project proactively included commitments to share grievance-related data via other means (on both numbers of complaints submitted and their resolution). As far as this research could find, there have not been independent or third party assessments of the project-provided data on how complaints were evaluated and addressed.

The *Essential Health Services Access Project's* CEPF included detailed plans for a project GRM. However, the research found limited evidence that the project had actually developed or implemented such a mechanism. The majority of health assistants interviewed and who responded to the online survey were unaware that the project had committed to operating a GRM. As Figure 9 shows, almost 70 percent of respondents were not aware that a project specific GRM was supposed to exist.

Two of the health assistants interviewed had some managerial responsibilities within the project, and they reported that they had seen a short, general discussion about plans for a GRM in the project's operational manual. The research team could not gain access to the manual directly to verify this, but according to these health assistants, the operational manual listed a telephone number and an email address that citizens could use to submit complaints. However, these respondents could not recall the manual having ever been made public, and the research could not find evidence that it had been. Therefore, while project

design included a commitment to a GRM, the research found no evidence that the *Essential Health Services Access Project* offered an operational GRM.

Figure 9. Online survey results – what health staff knew about the *Essential Health Services Access Project's* commitments to grievance redress



A member of the *Ayeyarwady Integrated River Basin Management Project* World Bank team acknowledged that as of September 2017, there was no GRM available even though implementation had started. The respondent stated that it was only required for areas where the project had begun micro projects (potentially as a result of safeguard requirements and resettlement issues) and not yet for the rest of the territory where the project would be implemented. Plans to set up a GRM for all beneficiaries to access, express their current concerns or provide feedback did not appear to exist as the project is not scheduled to implement in all areas at once. The World Bank staff member, however, said that the project team is always personally available, which in their opinion was more direct and efficient.

4.5 Project implementation conclusions

Implementation of CE measures lag behind initial project commitments. Fieldwork on the *Ayeyarwady Integrated River Basin Management* and *Essential Health Services Access* projects re-vealed large gaps between the CE commitments reported in public documents and the realities of implementation on the ground. The research found that only the *National Community Driven Development Project* carried out its CE design commitments consistently. These discrepancies highlight the significant limitation of assuming that project commitments captured in public program documents will in fact be met in practice. Unfortunately, in most cases, the robustness of the CE commitments on paper did not translate into action during implementation.

The public release of a project's operational manual—though crucial for informed CE and accountability efforts—is rare. Among the three projects assessed and within the broader Myanmar portfolio, only the *National Community Driven Development Project* made its operational manual publicly available. Efforts to access the operational manuals for the *Essential*

Health Services Access and *Ayeyarwady Integrated River Basin Management* projects during fieldwork were not successful. According to respondents, few beneficiaries knew of the manuals' existence or importance. This means there was limited or no public information available on the operationalization plans for CE in these two projects, directly debilitating effective, external monitoring.

The three projects consistently committed to engage citizens in collaborative decision-making and solicit their feedback, but fieldwork revealed some important deficiencies in implementation. The *National Community Driven Development Project* consistently provided citizen committees with opportunities to make decisions that matched the commitments made in project documents. However, budget constraints and other regulations often limited the degree to which committees could fully carry out their community development priorities and in some cases this led community members to question whether they really were driving the local development as the project claimed. The fieldwork found that the *Essential Health Services Access Project* made far more ambitious commitments for collaborative consultations and participatory processes than the project actually carried out. Fieldwork showed that the project only provided sporadic opportunities to provide feedback or contribute to decision-making. In those cases where citizens could participate in promised CE opportunities, there was limited evidence that the project then took up the feedback to inform ongoing implementation or that it even had processes in place to do so. Similarly, in the *Ayeyarwady Integrated River Basin Management Project*, community members were unaware of the existence of the highly touted Stakeholder Forum. They also consistently expressed their belief that the project had been exclusionary when choosing villages and individuals to participate in project consultations. These project findings thus defeat the purpose of the inclusive and transparent collaborative engagement efforts that the projects promised in their documents.

All three assessed projects committed to implementing a project level GRM for project-affected peoples in accordance with the Bank's social safeguards requirements, but in practice, only the *National Community Driven Development Project* had an operational GRM system. Given that that project actively encouraged communities to submit praise to the GRM, it is difficult to evaluate how it functioned in practice as a mechanism to resolve project grievances. Field research did not find any evidence of a functional GRM in either the *Ayeyarwady Integrated River Basin Management* or *Essential Health Services Access* projects, even though their project designs included such a commitment. This shows that the Bank's social safeguards policy requirements do not necessarily guarantee that relevant and mandatory CE commitments like the creation of a GRM will be carried out or if it adequately resolves complaints.

Within World Bank project budgets, CE measures are, in many cases, unfunded man-dates, hampering the effective implementation of a project's CE commitments. As was evidenced in all three projects investigated, the lack of dedicated funding for CE significantly curtailed implementation of project CE commitments (in the cases of the *National Community Driven Development* and *Ayeyarwady Integrated River Basin Management* projects) and adversely affected community members' ability to participate in CE opportunities when offered (in the case of the *Essential Health Services Access Project*). If this persistent issue is not addressed and projects are not required to allocate funding specifically for CE mechanisms and activities (independent of safeguards funding), it is unlikely that project CE outcomes will undergo a transformative change.

The lack of project information available in Burmese and other national languages as well as in accessible formats significantly contributed to beneficiaries misunderstanding CE opportunities and project parameters. The fieldwork revealed that beneficiaries across all three projects lacked sufficient understandings of the CE opportunities to which projects committed and the entitlements they are supposed to afford citizens. The lack of materials in Burmese, with fewer materials available in other national languages, only exacerbates this lack of understanding. Therefore, for citizens to be able to take advantage of the engagement opportunities, they need to be more clearly explained and translated (literally into national languages and figuratively into accessible terminology).

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Endnotes

1. Manroth, Astrid, Zenaida Hernandez, Harika Masud, Jad Zakhour, Miguel Rebolledo, Syed A. Mahmood, Aaron Seyedian, Qays Hamad, and Tiago Peixoto. 2014. *Strategic Framework for Mainstreaming Citizen Engagement in World Bank Group Operations: Engaging with Citizens for Improved Results (English)*. Washington, DC: World Bank Group. Retrieved October 4, 2019 (<https://openknowledge.worldbank.org/handle/10986/21113?locale-attribute=en>).

2. The World Bank Group (WBG) encompasses five distinct international organizations including: **The International Bank for Reconstruction and Development (IBRD)** and **the International Development Association (IDA)**, which work primarily with governments; **the International Finance Corporation (IFC)** and **the Multilateral Investment Guarantee Agency (MIGA)**, which support private sector investment; and **the International Centre for Settlement of Investment Disputes (ICSID)**, which adjudicates investment disputes that arise among international private sector companies and governments. This CE investigation focuses on the two government-serving WBG branches, **IBRD** and **IDA**, which together are most commonly known collectively under the umbrella moniker the “World Bank”. This oftentimes confusing title of World Bank for just two of the five entities that comprise the WBG results because “the IBRD and IDA constitute the World Bank proper, while the ICSID, IFC and MIGA are ‘affiliates’ that ‘are closely associated with the World Bank’” (Bebbington et al. 2006:10). Owned and managed by its 189 country members, IBRD/IDA (henceforth referred to as “the World Bank”) provided 71 percent of the WBG’s 2017 global financial assistance (US\$42.1 billion of the total US\$59 billion provided, World Bank 2017:4). The primary vehicles through which the World Bank provides financial assistance are autonomous projects, also called operations.

3. Induced participation is differentiated from organic participation, which can be spontaneous or, when organized, it is done so “by civic groups outside government, sometimes in opposition to it” (Mansuri and Rao 2013:xi).

4. The CE Strategy describes categories of citizen engagement mechanisms as follows: *Consultations; GRMs; collecting, recording, and reporting on inputs received from citizens; collaboration in decision-making; citizen-led monitoring, evaluation, or oversight; empowering citizens with resources and authority over their use; and citizen capacity building for engagement* (Manroth et al. 2014:31). The ARC assessment includes all CE Strategy categories except “empowering citizens without resources and authority over their use” for several key reasons. First, as described in the strategy, the only kinds of Bank projects that are in the position to implement mechanisms in this category are those designed to be Community Driven Development and therefore do not pertain to the majority of World Bank operations. By creating a CE category that only projects utilizing a CDD approach can fulfil, the strategy privileges this particular development model and creates a high-level category that, by definition, no other types of projects could reach. Furthermore, this framing takes for granted that the kinds of participatory mechanisms that comprise CDD approaches will lead to empowerment among those participating in the project. Although this study does not discount the benefit of CDD approaches and the embedded participatory opportunities they create, it does not accept the underlying premise that by their implementation, empowerment is achieved (see Mansuri and Rao 2013). Therefore, the ARC assessment did not utilize this category, understanding that participatory mechanisms that are part of the design of CDD operations will be captured in the other categories.

5. CDD is defined at the World Bank as “an approach that gives control over planning decisions and investment resources for local development projects to community groups” (World Bank 2018b).
6. <https://www.worldbank.org/en/projects-operations/environmental-and-social-policies>
7. As of October 1, 2018, the World Bank launched a new Environmental and Social Framework (ESF) that offered broader and more systematic coverage of environmental and social risks. All new projects apply the ESF while existing projects continue to apply the Safeguard Policies. All projects evaluated here, approved from FY15 to FY17, were subject to the previous Safeguard system and not the ESF. <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>
8. Myanmar’s 14 provinces are divided administratively into seven regions and seven states. The seven regions are ethnically predominantly Burman (Bamar) and the seven states are mostly ethnic minorities.
9. Respectively, these are village electrification committees, water user groups, and village health committees.
10. For more information on World Bank CDD projects and their components, see “Community-Driven Development Overview,” <http://www.worldbank.org/en/topic/communitydrivendevelopment>, accessed August 14, 2017.
11. The World Bank requires that the outcomes for indicators included in a project’s Results Framework be made public. However, the process by which these results are considered to meet this requirement is through bi-annual Implementation Status and Results Reports. These short documents, which typically include basic numerical reporting and minimal accounting of process or explanatory detail, are made available only via the project pages of the World Bank’s website.
12. Citizen monitoring is not included in Table 9, but both citizen feedback indicators may be fulfilled through citizen monitoring activities. There is not enough information in the project documents to determine if that will be the case.
13. Environmental and Social Management Frameworks (ESMFs) and Resettlement Policy Frameworks (RPFs).
14. The researchers did not have the chance to interview any midwives from the project. Therefore this concern could not be independently confirmed or denied.
15. Joint statement by Mandalay CSOs, read aloud by CSO member during meeting on August 2017 in Mandalay, Myanmar. Unpublished. Hard copy was obtained and translated by Wunna Htun.

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