Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 15-Mar-2017 | Report No: PIDISDSA21044
## BASIC INFORMATION

### A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Project ID</th>
<th>Project Name</th>
<th>Parent Project ID (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vietnam</td>
<td>P158981</td>
<td>Vietnam Social Security Modernization Project</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Region</th>
<th>Estimated Appraisal Date</th>
<th>Estimated Board Date</th>
<th>Practice Area (Lead)</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Lending Instrument</th>
<th>Borrower(s)</th>
<th>Implementing Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Investment Project Financing</td>
<td>Ministry of Finance</td>
<td>Vietnam Social Security, MOLISA</td>
</tr>
</tbody>
</table>

### Proposed Development Objective(s)

The Project Development Objective (PDO) is to enhance the efficiency of service delivery for social insurance and social assistance, as well as support synergies in social protection data systems.

### Components

- **Build and Integrated Social Security Card System**
- **Supporting Business Process Modernization and Training**
- **Project Management and Implementation Support**

### Financing (in USD Million)

<table>
<thead>
<tr>
<th>Financing Source</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Borrower</td>
<td>10.00</td>
</tr>
<tr>
<td>International Development Association (IDA)</td>
<td>100.00</td>
</tr>
<tr>
<td><strong>Total Project Cost</strong></td>
<td><strong>110.00</strong></td>
</tr>
</tbody>
</table>

### Environmental Assessment Category

**B - Partial Assessment**

### Decision

The review did authorize the preparation to continue

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**Note to Task Teams:** End of system generated content, document is editable from here.
B. Introduction and Context

Country Context

Vietnam has experienced rapid and inclusive economic growth since the early 1990s. Economic renovation (Doi Moi) reforms launched in 1986 have transformed it from one of the world’s poorest countries to a lower-middle-income one—with per capita gross national income of US$1,980 in 2015, and GDP growth between 1990 and 2014 averaging 5.5 percent. Growth has also been inclusive: incomes have risen across the income distribution, with only modest increases in inequality and an income Gini coefficient of around 0.39 in 2012, well below neighbors such as China and Malaysia. The percentage of people living in extreme poverty dropped from 50 percent in the 1993 to less than 3 percent today. In addition, social indicators have improved sharply, with outcomes in general education at or above many OECD countries (as measured by PISA), coverage of health insurance at around 70 percent of the population, and huge improvements in coverage of basic infrastructure such as electricity, roads and sanitation.

Nonetheless, significant challenges remain. In particular, a slowdown in productivity growth, slow formalization of the labor market, remaining welfare gaps of ethnic minorities (who make up 14 percent of the population but 60 percent of the poor), and environmental degradation coupled with the impact of global climate change threaten the long-term sustainability of the country’s development. Furthermore, despite major infrastructure spending needs, Vietnam faces shrinking financing options on account of growing fiscal pressures and insufficient private sector participation. Finally, the institutions of governance that were adequate to carry the country to its lower-middle-income level are now exposing gaps that need to be addressed with urgency and boldness, especially as pressures emerge from economic integration, urbanization, an aging population, and aspirations of a rising middle class. These challenges are well understood by the Government of Vietnam (Go), as reflected in the recent Vietnam 2035 report jointly prepared with the World Bank Group.

Sectoral and Institutional Context

In recent years, Vietnam has placed increased emphasis on reforms of its social protection system, both with respect to policies and delivery systems. In particular, the Resolution on Social Policies for 2012-20 sets out a wide ranging social protection and social services agenda, setting targets for expanded social insurance coverage and providing policy directions towards reducing fragmentation and ensuring minimum living standards. In 2014, the National Assembly approved amendments to the Social Insurance Law and the Health Insurance Law. Though these amendments move the system in the right direction, further reforms will be required given the challenging financial outlook for the pension system and the emerging speed of aging. Vietnam Social Security (VSS) has also developed a Modernization Plan for 2016-2020, which commits to comprehensive business process re-engineering, establishment of a nationally integrated MIS, and HR reforms within the organization. For social assistance, a Master Plan for social assistance reforms has been developed by MOLISA.

In its efforts to achieve an effective, efficient, and sustainable social security system, GoV has committed to modernizing social security administration as a key building block. The Social Security Development Strategy (SSDS) as approved in Decision No. 1215/QĐ-TTg of 2013 calls for continuing the modernization of Vietnam’s social security administration, strengthening capacity to improve the quality and efficiency of client service and implementation of social security policies. The 2014 social insurance reforms lay the legal framework for the SI and HI schemes respectively, including a
strengthened framework for administration and specific commitments to move away from paper-based business processes. MOLISA has also been strengthening its delivery systems, with a strong emphasis on streamlining program administration and data management.

Vietnam Social Security (VSS) is the public agency responsible for implementing social insurance policies nationwide. It manages the SI, HI, and unemployment insurance (UI) funds, and is responsible for registration of firms and individual contributors, contribution collection and compliance, benefit processing and payment, and other administrative functions for all social insurance programs. As noted, VSS has developed a comprehensive Modernization Plan for 2016-2020, which is supported by a five year IT Development Plan and a three year expenditure framework which was endorsed by the National Assembly and by decision of the Prime Minister in 2015. The Modernization Program aims to: (i) standardize and automate business processes to manage client identification, collect SI contributions, settle HI claims, and pay benefits payment for SI, UI and other insurances accurately and conveniently for firms and individual clients; (ii) consolidate the VSS organizational structure and build human resources capacity to ensure sustainable implementation of SI/HI policies and adapt the staff skills mix to the demands of a more automated and client-centric organization; and (iii) modernize information system and information technology infrastructure to support efficient implementation with improved data security, and make VSS more responsive to the service needs of a more mobile labor force, firms and health providers. This includes introduction of an integrated electronic social security card which would be used by both VSS and MOLISA clients to facilitate use of services and tracking of client transactions in the VSS and MOLISA business systems. A cross-cutting goal of the Modernization Plan is to make VSS services more client-oriented and improve customer satisfaction.

Apart from VSS, the other key agency in the social protection sector is the Ministry of Labor, Invalids and Social Affairs (MOLISA). In addition to its policy mandates on both social insurance and social assistance, the MOLISA national network manages most social assistance programs, social care services, programs for merit people and people with disabilities, employment services and payment of unemployment insurance benefits. It also manages the Poverty Census, which is the backbone instrument for identifying poor and vulnerable households in Vietnam (the most recent Poverty Census was carried out in 2015). MOLISA has in recent years created a national database based on the poverty census which has basic information on all poor and near poor households and individuals within those households.

In performing their functions, there is a need for major and regular data exchange between MOLISA and VSS: on the list of poor and near-poor households (which is needed to determine who is eligible for subsidized health insurance coverage); on the list of those who have made unemployment insurance contributions to VSS and are eligible for unemployment benefit payments from MOLISA; on merit people and those with disabilities (who have preferential social security provisions), etc. However, to date there is no automated data exchange platform or individual and household identification system which would allow reliable and real-time exchange of such operational data. Given the common identification and shared transactional needs of VSS and MOLISA, there is potential for realizing significant operational synergies from a common system of client identification and client interface with both systems.

An important element of VSS and MOLISA reforms which aims to improve efficiency, reliability and transparency of operations is the planned issuance of an integrated social security card (ISSC). This would meet the commitment under the SI and HI Laws to move from paper-based client identification and transaction systems to an electronic social insurance card by 2020. The ISSC would incorporate a unique ID for use within the VSS and MOLISA systems which would be linked to the National ID once the latter is rolled out towards the end of the decade. A central database of the beneficiaries will be used to issue the IDs and will provide the basic demographic information for issuing the ISSC. The existing VSS household database (which contains household and individual information on around 75 million VSS clients – of which the approximately 30 million MOLISA clients are a sub-set - collected through a household survey in 2015-16
and validated against the HI program database) will be the primary source harmonized with the MOLISA database in order to map the ID into the MOLISA database to facilitate data sharing between MOLISA and VSS.

The expected functions of the ISSC would include: (i) identification and authentication of status at the point of service for insured people using VSS services, including health insurance services; (ii) facilitating payment of health insurance, pension and other SI short term benefits administered by VSS; and (iii) beneficiary identification and payment for social assistance programs administered by MOLISA. The ISSC is planned to be an integrated circuit chip card and to contain information on personal demographics, relevant information on status for VSS and MOLISA programs, and fingerprints to allow for biometric authentication of the card user (the latter would need to rely on migration of data from MPS).

A broader e-government initiative of Go which is also relevant is the plan to link six national priority databases in order to improve sharing of citizen and enterprise data across agencies. The six national DBs are the national database on population under the Ministry of Public Security; the national land database under Ministry of Natural Resources and Environment; the national databases on business registration and population statistics under the Ministry of Planning and Investment; the national database on finance under the Ministry of Finance; and the national database on social insurance under VSS. This effort is coordinated by the Ministry of Information and Communications (MOIC). While not all the national databases are yet fully operational and/or populated (including the national ID database), the intention is ultimately to link the six national DBs through an Enterprise Service Bus (ESB) model. For such a system to be fully effective, having common identifiers for individuals (and firms) will be essential, and the matching of the VSS/MOLISA functional ID for individuals with the national ID number will be a key element of such linkage.

C. Proposed Development Objective(s)

Development Objective(s) (From PAD)
The Program Development Objective (PDO) is to enhance the efficiency of service delivery of social insurance and social assistance, as well as support synergies in social protection data systems.

Key Results

The PDO level results indicators proposed are as follows:

(i) Share of individual clients using ISSC for their health insurance, pension and social assistance transactions (%)
(ii) Share of VSS individual clients and MOLISA social assistance beneficiaries reporting satisfactory or higher level of satisfaction with usage of ISSC-initiated transactions (%)
(iii) Share of individual VSS clients and MOLISA social assistance beneficiaries issued with Integrated Social Security Cards (%).

Intermediate results indicators proposed are as follows:

(i) Share of VSS individual clients and MOLISA social assistance beneficiaries issued with unique social security ID number (%)
(ii) Number of VSS and MOLISA service-level officials and their third party service providers trained and with demonstrated proficiency in using ISSC transactions processing system
(iii) Share of VSS service points operating card reading/rewriting equipment (%).
D. Project Description
Component 1- Build an Integrated Social Security Card system (US$ 106.5 million)

This component is to support production and roll-out of Integrated Social Security Cards (ISSC), and investments in the operating platform and infrastructure for their use by individuals, health facilities, and VSS and MOLISA offices and outsourced partners such as VNPost. The ISSC would promote more integrated, efficient and user-friendly social security service delivery. The component would include:

(i) Building the master beneficiary database which would be the basis for issuance of a unique social security ID number to be embedded in the ISSC and used as the access key for access to VSS and MOLISA services.
(ii) Investments to design, build and test the card and ID management system to manage all card-related business processes and functions such as issuing of ID, printing of cards, update of beneficiary information, replacement of cards, authentication using biometrics etc.
(iii) Investments in ISSC card production, and supporting card reading, writing and other supporting hardware infrastructure: The component would finance purchase of blank smart cards (with medium capacity chip), the card production and issuance system, and supporting infrastructure for use of the cards.
(iv) Financing for phased roll-out of the ISSC. The roll-out of the ISSC would require a phased approach to provide the technical support to local authorities and service providers during the issuance process. The card production and issuance process would be tested in one province, with phased expansion to provincial and district offices, as well as VSS-contracted hospitals and VN Post offices providing services to VSS and MOLISA.
(v) Staff training and materials to ensure that the SSC system inter-operators with the underlying business systems of VSS and MOLISA and that it is sufficiently secure to avoid introducing cyber threats. This would include training on the VSS data, on operation of the IT infrastructure such as writers, readers and other devices to support use of cards in service provision, and managing with common cybersecurity concerns.

Component 2 (US$ 2.5 mln): This component would finance investments for VSS and MOLISA to support business process reforms associated with deployment of the ISSC, and investment in training resources for VSS staff. This component would provide advisory services to support VSS and MOLISA to adapt its business processes to use of the ISSC, and incorporation of the ISSC identifier and other information into relevant databases. This would also support preparations for enhanced data exchange between VSS and other national databases. In order to realize the operational benefits of improved business processes, the component would also support investments in content for the online training platform for VSS staff.

Component 3: Project Management and Implementation Support (US$ 1mln). The project management component would include:

(i) Project management and coordination activities (Procurement, Financial management, Disbursement). This would include the project audits and operating costs of the PMO.
(ii) Monitoring and Evaluation of the project interventions. This would include assessments of the impact of the ISSC roll-out and reformed business processes on the efficiency of VSS services and client satisfaction.
(iii) Capacity building, knowledge transfer, consensus building, including workshops and technical meetings.

E. Implementation
Institutional and Implementation Arrangements

Promoting social security system modernization and consolidation of processes and information across programs will require strong management and coordination across agencies at national and local levels. A National Project Steering Committee (NPSC) will be established. Members of the NPSC will be representatives of all relevant state agencies, including VSS, MOLISA, MOF, Ministry of Planning and Investment (MPI), Ministry of Health (MOH), and the Ministry of Information and Communication (MoIC), to ensure smooth and effective coordination for project implementation. The NPSC, with VSS and MOLISA representatives being permanent members, will be responsible for providing guidance and directives on the consolidation/integration process. VSS as the PIA for the SSSMP will establish a Project Management Unit (PMU) under VSS. The PMU will directly manage and coordinate project activities, implement annual action plans, build necessary capacity, and provide technical advices and guidelines for project implementation. The PMU is supervised by the VSS General Director who is in charge of social security program implementation. The PMU comprises a team of officials from related VSS departments and hired technical specialists.

Note to Task Teams: The following sections are system generated and can only be edited online in the Portal.

F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

Project implementation will be at the national level and in selected project provinces. Some provinces may have a high share of ethnic minority people.

G. Environmental and Social Safeguards Specialists on the Team

Giang Tam Nguyen, Khang Van Pham

SAFEGUARD POLICIES THAT MIGHT APPLY

<table>
<thead>
<tr>
<th>Safeguard Policies</th>
<th>Triggered?</th>
<th>Explanation (Optional)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Assessment OP/BP 4.01</td>
<td>Yes</td>
<td>The project does not finance any civil works and involve disposal of IT equipment as the result of supporting infrastructure (hardware and data sharing software) to ensure their effective use (e.g., card reading machines at VSS offices, health facilities, and service providers such as VN Post). In addition, TA activities are to build capacity to VSS and support development of the institutional and legal framework for information sharing across databases and agencies. Thus, the project is</td>
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envisaged to not create potential negative environmental impacts. This policy is triggered as the project will have social implications, especially involvement of ethnic minority groups. Therefore, SA will be conducted by VSS during project preparation to assess the potential adverse and positive impacts of the project and identification of measures necessary to avoid adverse impacts or if such measures are not feasible, the identification of measures to minimize, mitigate, or compensate for such impacts. The draft SA was initially disclosed in country in February 2017. The final version was disclosed on VSS website on March 15, 2017 and submitted to Bank Infoshop on same date.

<table>
<thead>
<tr>
<th>Natural Habitats OP/BP 4.04</th>
<th>No</th>
<th>Given the nature of the activities, the project does not cause any negative impacts such as conversion or degradation of natural habitats.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Forests OP/BP 4.36</td>
<td>No</td>
<td>Given the nature of activities, the project does not cause any negative impacts on forests.</td>
</tr>
<tr>
<td>Pest Management OP 4.09</td>
<td>No</td>
<td>The project will neither finance procurement of any pesticides nor cause increase in use of pesticides as its result.</td>
</tr>
<tr>
<td>Physical Cultural Resources OP/BP 4.11</td>
<td>No</td>
<td>The project does not involve any civil works so it will not involve significant excavations, demolition, and movement of earth, flooding or other environmental changes. Further, the project is not designed to support management of Physical Cultural Resources.</td>
</tr>
<tr>
<td>Indigenous Peoples OP/BP 4.10</td>
<td>Yes</td>
<td>Generally, the project will bring positive benefits to beneficiaries of social insurance, health insurance and social assistance programs due to an integrated Social Security Card (SSC) System, which will promote more integrated, efficient and user friendly social protection service delivery. However, in some provinces, high rates of ethnic minority (EM) people are beneficiaries of subsidized health insurance and social assistance programs across the country. EM people generally have poorer education and live in more disadvantaged regions, and thus may not effectively access or benefit from the project’s intended benefits. Therefore, a social assessment (SA) was conducted to understand any specific barriers that may preclude EM groups from benefiting from the project's integrated SSC system,</td>
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</table>
and any adverse impacts or social risks that the project may cause to EM people. The SA provides relevant recommendations on what works best to effectively facilitate the access of EM groups to the project’s benefits, especially regarding communication strategy, free, prior and informed consultation, alternative measures or tailored support. In addition, an Ethnic Minority Planning Framework (EMPF) has been prepared as a basis for the provinces with high rates of EM beneficiaries to produce Ethnic Minority Development Plans (EMDPs) before project activities are implemented in their provinces. The EMPF was disclosed on VSS website in draft in February 2017 and final version disclosed on VSS website on March 15, 2017 and submitted to Bank Infoshop on same date.

<table>
<thead>
<tr>
<th>Involuntary Resettlement OP/BP 4.12</th>
<th>No</th>
<th>This policy is not triggered as not land acquisition is envisaged due to the implementation of the project activities.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safety of Dams OP/BP 4.37</td>
<td>No</td>
<td>The project does not include activities related to new construction of dams and/or rehabilitation of existing dams. In addition, the project activities do not rely on the performance of an existing dam or dam under construction.</td>
</tr>
<tr>
<td>Projects on International Waterways OP/BP 7.50</td>
<td>No</td>
<td>The project does not involve the use or potential pollution of International Waterways.</td>
</tr>
<tr>
<td>Projects in Disputed Areas OP/BP 7.60</td>
<td>No</td>
<td>The project is not located in any disputed areas.</td>
</tr>
</tbody>
</table>

**KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT**

**A. Summary of Key Safeguard Issues**

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The project would have mostly positive impacts as it enhances efficiency of social security administration and would improve quality of services for clients of VSS and MOLISA, as well as synergies between VSS and MOLISA. Further, the project will provide advisory services and capacity strengthening to VSS in order to simplify business processes; and support staff training and technical assistance to ensure that the SSC system inter-operates with the business systems of VSS.

The project does not finance any civil works or involve disposal of IT equipment. In addition, TA activities support development of the institutional and legal framework for information sharing across databases and agencies. Thus, the project is not envisaged to create potential negative environmental impacts. This policy is triggered as the project will have social implications, especially involvement of ethnic minority groups. Therefore, SA was conducted by VSS during project preparation to assess the potential adverse and positive impacts of the project and identification of
measures to avoid adverse impacts or if such measures are not feasible, the identification of measures to minimize, mitigate, or compensate for such impacts. Draft SA was disclosed in country on February 28, 2017, and final version on March 15, 2017.

The project would address major constraints of the current paper-based situation regarding the administration of social insurance, health insurance and social assistance, such as fragmented administration, requirements for multiple documents for use of services, non-durability of paper documents with serious implications for service use. Potential beneficiaries, including those from ethnic minority (EM) groups, welcome the durability, safety and convenience that ISS cards may bring about. They find it easier to keep plastic cards in hard weather conditions and can use the cards on a long-term basis without disruption of services.

However, EM beneficiaries voiced concerns that may preclude them from fully benefiting from ISSC, such as language barrier, limited education, distances from commune/district centres, limited or no experience with electronic transactions. In addition, EM beneficiaries are concerned about effective communication, including regular consultation and training on usage, with potential EM beneficiaries.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:
No potential and/or long-term adverse environmental and social impacts due to anticipated future activities in the project area are foreseen.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.
None.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

SA was conducted by VSS during project preparation to assess the potential adverse and positive impacts of the project and identification of measures necessary to avoid adverse impacts or if such measures are not feasible, the identification of measures to minimize, mitigate, or compensate for such impacts. Draft SA disclosed in country on February 28, 2017 and final version on VSS website and Bank Infoshop submission on March 15, 2017.

Social Safeguards
Consultations were conducted in order to confirm the ethnic minority communities’ support to the project and ensure all their needs and concerns are taken into account in the design and implementation of the project activities. With the inputs from the SA, an Ethnic Minority Planning Framework (EMPF) has been prepared as a basis for the provinces with high rates of EM beneficiaries to produce Ethnic minority Development Plans (EMDPs) before project activities are implemented in their provinces. The EMPF helps ensure (a) affected ethnic minority peoples receive culturally appropriate social and economic benefits; (b) when there are potential adverse effects on ethnic minority peoples, the impacts are identified, avoided, minimized, mitigated, or compensated for.

Borrower Capacity
VSS will be the implementing agency. However, VSS has not implemented any the Bank-financed projects yet. Therefore, it is necessary to strengthen capacity for safeguard for VSS through providing safeguard training to its staff responsible for project safeguard issues in the early stage of the project implementation.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.
There would be two broad categories of beneficiaries of the project. The first would be users of VSS and MOLISA systems. This would include current contributors to social insurance programs (individuals and firms), and
beneficiaries of both social insurance programs operated by VSS and social assistance programs operated by MOLISA. The second category of beneficiaries would be service providers in the VSS and MOLISA systems. This includes both the VSS and MOLISA office networks themselves, and the providers with whom those offices and clients interact on a regular basis, including health facilities (when insured health services are provided and processing of claims is undertaken) and outsourced providers such as VN Post (who manage benefit payments for both VSS and MOLISA).

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other

<table>
<thead>
<tr>
<th>Date of receipt by the Bank</th>
<th>Date of submission to InfoShop</th>
</tr>
</thead>
</table>

For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors

"In country" Disclosure
Vietnam
15-Mar-2017

Comments
The main assessment was a social assessment under Category B as triggered by safeguards assessment, together with an Ethnic Minority Planning Framework. Environmental risks per se are rated Low, as are social.

Indigenous Peoples Development Plan/Framework

<table>
<thead>
<tr>
<th>Date of receipt by the Bank</th>
<th>Date of submission to InfoShop</th>
</tr>
</thead>
</table>

"In country" Disclosure
Vietnam
15-Mar-2017

Comments

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)

OP/BP/GP 4.01 - Environment Assessment

Does the project require a stand-alone EA (including EMP) report? No
OP/BP 4.10 - Indigenous Peoples

Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?
Yes
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?
Yes
If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit or Practice Manager?
NA

The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank's Infoshop?
Yes
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?
Yes

All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?
Yes
Have costs related to safeguard policy measures been included in the project cost?
Yes
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?
Yes
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?
Yes

CONTACT POINT

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Nga Nguyet Nguyen  
Senior Economist

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Ministry of Finance

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**APPROVAL**

| Task Team Leader(s): | Philip B. O'Keefe  
Nga Nguyet Nguyen |

**Approved By**

| Safeguards Advisor: |  |
| Practice Manager/Manager: | Jehan Arulpragasam | 16-Mar-2017 |
| Country Director: | Achim Fock | 17-Mar-2017 |