

2015  
Project Implementation Review (PIR)  
of

**PIMS 4863**

**Strengthening The Resilience Of Post Conflict Recovery And Development To Climate Change  
Risks In Sri Lanka**

**Table of Contents**

A. Basic Project and Finance Data .....	<a href="#">2</a>
B. Project Contacts and Links .....	<a href="#">2</a>
C. Project Summary .....	<a href="#">2</a>
D. Progress toward Development Objective .....	<a href="#">3</a>
E. Progress in Implementation .....	<a href="#">6</a>
F. Adjustments .....	<a href="#">9</a>
G. Critical Risk Management .....	<a href="#">9</a>
H. Environmental and Social Grievances.....	<a href="#">10</a>
I. Communicating Impact .....	<a href="#">10</a>
J. Partnerships .....	<a href="#">10</a>
K. Progress toward Gender Equality .....	<a href="#">11</a>
L. Annex 1 - Ratings Definitions .....	<a href="#">12</a>

### A. Basic Project and Finance Data

Project Implementing Partner: Ministry of Disaster Management

GEF Focal Area: Climate Change - SCCF

Country(ies) (SRL) Sri Lanka

Project Start Date: 25-Jun-2014

Planned Project Closing Date: 30-Jun-2017

Dates of Project Steering Committee/Board meetings during reporting period: June 2015 December 2014 August 2014

Total GEF Grant (U\$S) \$ 3,121,818

GEF Grant Disbursed as of 30 June (U\$S): \$ 0.00

Total Co-financing (as planned in CEO endorsement request): \$ 57,095,000

Overall Risk Rating High

Overall DO Rating

Overall IP Rating

### B. Project Contacts and Links

Partner	Contact Name	Email Address
Project Coordinator / Manager	Sampath Abeyrathne	sampath.abeyrathne@undp.org
UNDP Country Office Programme Officer	Dhanushki Abhayarathne	dhanushki.abhayaratne@undp.org
Project Implementing Partner	W.M. Bandusena, Ministry of Disaster Management	
GEF Operational Focal Point	Ajit Silva	koralage2001@yahoo.com
Other Partners		
UNDP Technical Adviser	Srilata Kammila	srilata.kammila@undp.org
UNDP Programme Associate		

Project website, etc.	
Links to media coverage	

### C. Project Summary

Commented [CO1]: We need a project summary

D. Progress toward Development Objective

Objective/Outcome	Description	Description of Indicator	Baseline Level	Target Level at end of project	Level at 30 June 2015
Objective	Increase the resilience of communities to climate change induced hazards through integration of climate smart policies and actions in to development planning and budgeting.	No of sectoral adaptation strategies identified by the project approved and budgeted by the Departments of Agriculture, Agrarian Development, Coastal Conservation and Ministry of Economic Development  Climate risk assessment is an integral part of development planning at national and district level	< 05  climate risk assessment is non-existent	> 20 strategies and their associated actions implemented  Climate risk assessment included in planning processes for VDPs, district development plans and Gama Neguma/Divi Neguma national Programmes in 12 vulnerable districts	It is too early to report the progress against the objective especially because the IP Ministry was dissolved 4 months after the project started. The project was then re-assigned in June 2015, 5 months later.  because the project was inhas been in operation for less than 5 months. Nevertheless, during this period the project was able to identify a set of key adaptation actions with relevant government departments. The achievement of the development objectives was significantly affected by recent changes in the political situation of the country. For example, minor irrigation cascade development with climate and disaster resistant designs was identified as one of the key adaptation strategies with the Department of Agrarian Development. At the same time, nature farming home gardening, micro irrigation development, commercial agriculture such as cultivation of Pineapple and Banana with buy back agreements with exporters were identified as key adaptation actions with the Provincial Department of Agriculture. These will increase the resilience of the community in Kurunegala district and thus they will be implemented in year 2015.
Outcome 1	National rural development programmes Divi Neguma and Gama Neguma integrate climate risk information and adaptation measures	No of Gama Neguma and Divi Neguma projects modified through climate risk assessments at GN and Divisional Level	0	> 150 Gama Neguma Projects  > Divi Neguma Strategies including  -crop selection for home gardens	Divinaguma programme was influenced to implement adaptive livelihood measures and incorporate climate and disaster resistivity resilience into the existing programs. For example, diversified livelihood development programs were

September 23, 2015 August 20, 2015 August 14, 2015 July 25, 2015

**Commented [CO2]:** Please don't add very detailed responses here. Focus your response to whether or not (or, to what extent) were the targets of each indicator in the left met. Detailed info on what happened in the past year should go below, under implementation progress. I have deleted some extra details in the responses, below.

**Commented [CO3]:** This is not accurate. Technically, the project started operations in 25 June 2014, which would mean, it has been active and operational for one year.

**Commented [DA4]:** True. But only on paper.

**Commented [CO5]:** From the "target" in the left column, it seems that we need to modify or influence 150 projects. Is this programme one of these 150 projects?

**Commented [DA6]:** No. it's the 2<sup>nd</sup> target

**Commented [CO7]:** How many?

	in 12 vulnerable districts			-perennial crops for small commercial farms -livestock choice -water and soil management incentives -inland/freshwater fishery	promoted in order to minimize dependency on water. <del>This included the implementation of a larger scale poultry farming program in climate and disaster sensitive manner. However the achieving of the development objectives were significantly affected by the changed political situation of the country.</del>
Outcome 2	National, district, divisional and local technical staff have sufficient technical capacity to identify and integrate climate risk considerations in designing, approving and implementing development projects under the Gama Neguma and Divi Neguma programmes	Number of staff (disaggregated by gender) within national, district, divisional and local planning units in 12 vulnerable districts reported to apply climate risk assessment tools and methods to new rural investment projects  No of stakeholder groups reporting enhanced awareness of climate change risks and adaptation measures at national, district and village levels	0  0  (lack of awareness has been reported as a major barrier during stakeholder consultations)	National officers of NPD, MoED, MoF = 20 Technical agencies and department= 50 District Planning and Samurdhi officers= 75 Village Mobilisers= 300 Local Authority Technical Officers =120 Trainers trained =15  Key stakeholder groups listed below report higher level of awareness measured by before and after survey-Officers of National Planning, Ministry of Finance and Ministry of Economic Development -Divi Neguma Task Force at National and District level -District Planning Units -Divisional Planning Units -Village mobilisers-communities in risk prone GN units	The progress against this outcome is low because <del>the implementation partner IP being dissolved 4 months after the project started of the earlier mentioned political issues.</del> However, <u>to date</u> <del>During that time</del> the awareness of 20 government officers <del>who directly took part in the project implementation</del> was enhanced on climate change adaptation in development planning.
Outcome 3	Concrete adaptation actions defined and implemented in selected vulnerable villages/ village clusters in the 12 target districts to increase resilience of rural development programmes to climatic risks	% increase in annual income of farmers (disaggregated by gender) as a result of project introduced adaptation measures implemented in home gardens and small farms  Total value of community driven rural infrastructure built following building codes and construction controls and guidelines	annual income = or < USD1500 in target farm households 0	15% increase against baseline by 2015 20% increase against baseline by 2016  > USD 2.25 million At least 50% over the baseline value of Gama Neguma Investment in five villages per districts	<del>The progress against this objective is also low for reasons given above. However</del> <u>To date</u> , the project was able to set the ground for implementing <del>concrete</del> climate change adaptation actions by identifying key economic sectors <del>(including minor irrigation and agriculture development)</del> and adaptation priorities.  <del>Kurunegala district located in Daduru oya river basin is considered as the district with highest density of minor</del>

**Commented [DAB]:** Yes, that's why its mentioned against the achievement of the main objective. This is repeated here.

**Commented [CO9]:** Wouldn't this affect the implementation of all outcomes and not just Outcome 2?

**Commented [CO10]:** Since we need to report on "stakeholder groups" of ministries and agencies such as Planning, Finance, etc (according to the target in the left column), it would be good to mention the ministries under which these 20 officers work.

		for climate and disaster risk reduction			<p>irrigation tanks in the country. Climatic change impacts are highly associated with water deficit and agriculture sector in Kurunegala district. Therefore minor irrigation and agriculture development were identified as two key economic sectors to implement adaptation actions.</p> <p>The project <u>team</u> was able to set the ground <u>for implementing collaborate actions for collaborative work between with</u> the Department of Agrarian Development and Provincial Department of Agriculture. The project initiated implementation <u>of of concrete climate change adaptation actions in Kurunegala district during the year 2014. This included</u> minor irrigation cascade system development, micro irrigation development and agriculture development. However, <u>some planned activities could not be completed given the dissolution of the Ministry of Economic Development, the identified IP, the project was unable to complete planned minor irrigation and micro irrigation development activities once the Ministry was dissolved.</u></p>
--	--	-----------------------------------------	--	--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Progress toward Objective Development	Rating	Comments
Project Manager/Coordinator	Satisfactory	<p>The Project Manager was able to streamline the project activities towards achieving the development objectives by identifying the key economic sectors, priority adaptation actions and developing linkages with key government agencies. <u>However, the Although Project Manager was able to set the ground for implementing adaptation actions to achieve the development objective, the activities could not be continued due to the external factors that are beyond the control of Project Manager dissolution of the IP.</u> This significantly <u>affected delayed</u> the project progress. <u>However, now the project has reinitiated activities ..... re-started.</u></p> <p>The outcome level indicators <u>does</u> not measure the progress of adaptation actions and thus output level indicators were developed.</p>

**Commented [CO11]:** NOTE: we are NOT rating the PM here; here is where the PM rates the project, in terms of CUMULATIVE progress towards reaching the end targets.

**Commented [CO12]:** I think we need to be more specific here regarding the following:  
 -when did the IP dissolve?  
 -Is the IP operational again? Since when?  
 -What is the PMU going to do, or already did in order to ensure that activities are back on track in spite of delays?

		<u>The new IP, the Ministry of Disaster Management, agreed to the option of UNDP providing additional support functions to the project. This 'Assisted NIM modality' was implemented in order to support the limited staff capacity of this new Ministry and to minimize the risk of reduced delivery in 2015 due to the that the project delivery is affected by upcoming parliamentary election in August 2015.</u>
UNDP Country Office Programme Officer	Moderately Satisfactory	<p>The project is rated as Moderately Satisfactory, due to the fact that it is still expected to achieve most of its major objectives and globally relevant impacts, despite the project's poor performance during this reporting period. This is the first year of operation of the project, the project start was delayed for multiple reasons, and eventually the project document was signed in July 2014. The project activities started by September, and implemented rapidly till December 2014.</p> <p>January 8, 2015 Sri Lanka held its Presidential Elections, and the new Government chose to dissolve the (IP) Ministry of Economic Development (MED) which housed the DiviNeguma Department. The project was not allocated to another Ministry till June 2015, and ultimately UNDP managed to meet with senior Ministers in the Government and push for the project to be allocated. It was then allocated to the Ministry of Disaster Management (MDM). MDM has started implementing the project immediately.</p> <p>Nevertheless these issues have caused significant delays to the project, which could not be avoided. However currently, the project is operational, and proceeding rapidly. UNDP expects significant progress in the last 2 quarters of 2015 and progress towards achieving the outputs especially of outcome 3 where most of the work is focusing this year.</p>
Project Implementing Partner		
GEF Operational Focal point		
Other Partners		
UNDP Technical Advisor		

## E Progress in Implementation

Outcome 1: National rural development programmes Divi Neguma and Gama Neguma integrate climate risk information and adaptation measures in 12 vulnerable districts
<p><del>The progress of this output is fairly low since the IP was dissolved 4 months after the project was started.</del></p> <p>During this reporting period the project was able to integrate <del>couple a few of</del> adaptation measures into <del>the</del> Divi Negum program. <del>For example Minor irrigation cascade development with climate and disaster resistant designs was identified as one of the key adaptation strategies with the Department of Agrarian Development. At the same time, nature farming home gardening, micro irrigation development, commercial agriculture such as cultivation of Pineapple and Banana with buy back agreements with exporters were identified as key adaptation actions with the Provincial Department of Agriculture. These will increase the resilience of the community in Kurunegala district and thus they will be implemented in year 2015.</del></p> <p>The project influenced the Divinaguma programme to implement adaptive poultry farming by introducing <del>ge</del> <u>especially</u> designed movable poultry cages with sufficient ventilation to withstand extreme weather situation. <del>This p</del> Poultry farming program was</p>

**Commented [CO13]:** Please indicate each output under each Outcome, with its number ("output 1.1; 1.2; etc). In this section, report ONLY on the progress between 1 July and 30 June.

implemented throughout the Kurunegala district in 18 Divisional Secretariat Divisions. 11,030 poultry chicks with 1,103 movable poultry cages were provided to 1,103 beneficiary families in Kurunegala district. The objective of this program ~~is~~ was to reduce livelihood dependency on water, diversify the livelihoods to reduce risk and increase the resistivity of the intervention to extreme weather phenomenon. This will also improve the food and nutrient security of the beneficiary families.

The project also set the ground for developing village development plans and divisional level climate exposure and sensitivity maps in selected districts.

Outcome 2: National, district, divisional and local technical staff have sufficient technical capacity to identify and integrate climate risk considerations in designing, approving and implementing development projects under the Gama Neguma and Divi Neguma programmes

Training and capacity building of the project immediate stakeholders

The project conducted a training workshop for 20 Divisional Officers, Agriculture Instructors, Livestock Development Instructors, and Farmer Organizations in the selected project locations on climate change adaptation in irrigation rehabilitation and agriculture development. Following objectives were achieved through this training programme; (a) project immediate stakeholders have a better understanding of climate change adaptation and how it applies on selected project locations, (b) technical knowledge of the immediate stakeholders in the selected locations were enhanced on nature farming home gardening and irrigation rehabilitation.

Outcome 3: Concrete adaptation actions defined and implemented in selected vulnerable villages/ village clusters in the 12 target districts to increase resilience of rural development programmes to climatic risks

Kurunegala district located in Daduru oya river basin is considered as the district with highest density of minor irrigation tanks in the country. Climatic change impacts are highly associated with water deficit and agriculture sector in Kurunegala district. Therefore minor irrigation and agriculture development were identified as two key economic sectors to implement adaptation actions. The project selected 32 minor irrigation tanks in Kurunegala district for rehabilitation. The project was able to complete the surveying and planning of 5 tanks while that of other 27 tanks are on going. The contracts were issued for the rehabilitation of 3 tanks. However the rehabilitation was delayed since January. However, now the project work has re-started and rehabilitation of 32 tanks will be completed during period of next 3 months.

The project also implemented agriculture development and animal husbandry programme in year 2014. The project promoted the cultivation of perennial fruit crops in order to increase the land and water use efficiency of the beneficiary villages. The initial phase of the project has selected 5 villages in 3 Divisional Secretariat Divisions for perennial fruit crops cultivation actions. The perennial fruit cultivation actions are implemented through farmer organization. The project supported the farmers to plant 20,000 fruit seedlings (pomegranate-4,000, guava-5,000, banana-3,000, orange 6,000 and lemon 2,000). Farmer trainings were also conducted on agricultural technologies, and marketing linkages were facilitated with buy back guarantee.

Poultry keeping programme was implemented throughout the Kurunegala district in 18 Divisional Secretariat Divisions. 11,030 poultry chicks with 1,103 movable poultry cages were provided to 1,103 beneficiary families.

Progress toward Implementation	Rating	Comments
Project Manager/Coordinator	Satisfactory	Although Project Manager manages day to day project operations well, the progress of the project is very much behind the target because the project implementation was significantly affected by the external factors that are totally beyond the control of Project Manager. For example the project operation was completely stopped for 6 months until the new government assigns the project to a relevant ministry (the government was changed after the presidential elected held on January and with that the line ministries were significantly changed. The new government

		<p>priorities the constitutional issues and the development project were affected badly.</p> <p>Very recently the project was assigned to the Ministry of Disaster Management and now the project is back on track.</p>
<p>UNDP Country Office Programme Officer</p>	<p>Moderately Satisfactory</p>	<p>This is the first year of operation of the project, the project start was delayed for multiple reasons, and eventually the project document was signed on 25 July 2014. The first Steering Committee (SC) of the project was held on the 18th September 2014. The SC approved an annual work plan (AWP) and budget of 790,000 US\$, of the original 1,037,822 US\$ 2014 AWP, for the remaining three months of 2014. UNDP was skeptical of achieving this 2014 plan but the National Coordinator was confident and the Secretary supported the decision, and endorsed recruiting 4 full time and 8 Part time cadre to the project in addition to the Technical Coordinator recruited from UNDP. Ground level work started only in Kurunegala and Puttalam districts this year. The National Project Coordinator of MoED together with UNDP, developed work plans to expedite the anticipated work for this year, to achieve maximum results over the three month period. Accordingly a number of activities were conducted as described in this report.</p> <p><del>January 8, 2015 Sri Lanka held its Presidential Elections, and the new Government chose to dissolve the (IP) Ministry of Economic Development (MED) which housed the DiviNeguma Department. The department was scaled down significantly, and shifted to another Ministry. Following the dissolution of the MED, the</del> project was not allocated to another Ministry till June 2015, despite UNDP's consistent efforts due to the government focus on the 100 day programme. Ultimately UNDP managed to meet with senior Ministers in the Government and push for the project to be allocated. It was then allocated to the Ministry of Disaster Management (MDM). While this decision is positive and the programme can synergize with the UNDP Comprehensive Disaster Management Programme in the same ministry, there remains certain aspects that will still have to be linked with the DiviNeguma programme. This partnership with the department is yet to be fully established.</p> <p>A number of contextual factors have significantly affected the project progress, delaying activities for over 6 months. Since June 2015, the MDM has started implementing the programme, however certain issues have already arisen especially related to project management. The MDM is a much smaller ministry than the previous MED, and lacks a lot of the funds and staffing of MED. The MDM is unable to provide the staffing capacity that the project requires, and temporarily UNDP has stepped up to provide increased support. More short term technical local consultancies are being developed to enable the field level work to progress. The first board meeting for the year was held on the 9th June 2015, and work is rapidly progressing on the 3rd outcome area on the ground level. UNDP believes, that if no further major organisational changes come up from the next parliamentary election, the project should be able to achieve some real progress in 2015 3rd and 4th quarters.</p>

**Commented [CO14]:** Don't repeat from the explanations in the DO rating. Simply explain the rationale behind rating the past year as "satisfactory"



Project Implementing Partner		
GEF Operational Focal point		
Other Partners		
UNDP Technical Advisor		

## F. Adjustments

Project Planning				
Key project milestone	Status	Original Planned Date (Month/Year)	Actual or Expected Date (Month/Year)	Comments
Inception Workshop	on schedule	June - 2014	June - 2014	
Mid-term Review	n/a	-	-	
Terminal Evaluation	n/a	-	-	

**Commented [PJ15]:** Please give "Original Planned date" and "Actual/Expected Date" for both MTR and TE in the online PIR.

## G. Critical Risk Management

Critical Risks Type(s)	Critical Risk Management Measures Undertaken in 2015
Political	The presidential election and subsequent change of the government affected the project progress. The line ministries were changed under the new government, and the Implementing Partner the Ministry of Economic Development was dissolved. <del>This was a risk factor that was beyond the control of project.</del> The project was reassigned only 6 months later. Parliament elections scheduled for mid August is also expected to affect the project and therefore to mitigate this risk, UNDP has discussed with the new IP and will provide assisted NIM support for a period of 1 year from June 2015.
Organizational	The ProDoc specified that the IP Ministry of Economic Development would provide a certain number of staff to work on the project. The new IP Ministry of Disaster Management is a much smaller ministry with less staff, and is unable to provide the identified staff to support the project. Full time cadre cannot also be allocated as per government rules. This is expected to affect the project implementation. This is another reason that the Ministry and UNDP agreed for UNDP to provide assisted support to NIM for a period of an year.
Political	Over the last 6 months in the Ministry of Disaster Management, the Secretary has changed thrice. After the August parliamentary elections, more changes to senior staff in the ministry is expected. Very frequent changes of the key senior staff of the key ministries will affect the progress. This issue will continue until the political situation of the country become stabilized. The project will implement under an assisted NIM modality to manage this risk.
Operational	The project is now adopting a rapid mode of delivery <u>to make up for the 6 months of non delivery in 2015, and complete infrastructure construction before the rainy season. However the probability of quality of work being compromised is quite high.</u> <del>Thus</del> Therefore the project is paying special

**Commented [CO16]:** These risks must correspond to there risks that appear in the ATLAS log. We also need to determine the total number of critical risks in order to calculate the overall risk rating of the project.

**Commented [DA17]:** From your comment, its not clear what needs to be done here. Can you be more specific pls.

	attention <del>for</del> to quality assurance in order to minimize the operational risks associated with quality control, monitoring and evaluation.
Operational	As per the prodoc, the project is supposed to incorporate climate change adaptation into the village development plans that are to be produced by the Department of Divinaguma Development. However, Department of Divinaguma Development has been down-graded by the new government and thus it is more likely that the village level development plans will not be produced by them. This is a risk for the project. Nevertheless the project plans to develop climate and disaster sensitive village level development plans during the year 2015-2016.

- Commented [CO18]:** What exactly IS the operational risk here?
- Commented [CO19]:** What is the difference between this operational risk and the operational risk above?
- Commented [DA20]:** Your questions not clear. What is not clear about this comment?

Overall Risk Rating: HIGH

#### H. Environmental and Social Grievances

Related environmental or social issue	
Status	
Significance	
Detailed description	During the project period, no <del>greivancees</del> <u>grievances</u> have been received or recorded.

#### I. Communicating Impact

Tell us the story of the project focusing on how the project has helped to improve people's lives.
It is too early to report on this as most of the newly initiated actions are not yet matured to make changes of the lives of the people.
What is the most significant change that has resulted from the project this reporting period?
The newly initiated project actions are not yet matured enough to make significant changes of the people lives so far.
Describe how the project supported South-South Cooperation and Triangular Cooperation efforts in the reporting year.
N/A

#### J. Partnerships

Partners	Innovation and Work with Partners
Civil Society Organisations/NGOs	N/A
Indigenous Peoples	N/A
Private Sector	N/A
GEF Small Grants Programme	N/A

Other Partners	The project is partnering with UNV programme to develop village development plans and divisional level climate exposure and sensitivity maps. This partnership adds value for the project as the Department of Divinaguma Development no more have the mandate to develop village level development plans.
----------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

#### K. Progress toward Gender Equality

Has a gender or social assessment been carried out this reporting period?	Will be carried out in <del>2016</del> the future
If a gender or social assessment has been carried out what where the findings?	
Does this project specifically target woman or girls as direct beneficiaries?	Yes
Please specify results achieved this reporting period that focus on increasing gender equality and improving the empowerment of women.	The poultry keeping program implemented by the project will increase the income for women which is mainly spent on family consumption and children's education.

## L. Annex 1 - Ratings Definitions

### Development Objective Progress Ratings Definitions

*Highly Satisfactory (HS):* Project is expected to achieve or exceed all its major global environmental objectives, and yield substantial global environmental benefits, without major shortcomings. The project can be presented as 'good practice'.

*Satisfactory (S):* Project is expected to achieve most of its major global environmental objectives, and yield satisfactory global environmental benefits, with only minor shortcomings.

*Moderately Satisfactory (MS):* Project is expected to achieve most of its major relevant objectives but with either significant shortcomings or modest overall relevance. Project is expected not to achieve some of its major global environmental objectives or yield some of the expected global environment benefits.

*Moderately Unsatisfactory (MU):* Project is expected to achieve of its major global environmental objectives with major shortcomings or is expected to achieve only some of its major global environmental objectives.

*Unsatisfactory (U):* Project is expected not to achieve most of its major global environment objectives or to yield any satisfactory global environmental benefits.

*Highly Unsatisfactory (HU):* The project has failed to achieve, and is not expected to achieve, any of its major global environment objectives with no worthwhile benefits.

### Implementation Progress Ratings Definitions

*Highly Satisfactory (HS):* Implementation of all components is in substantial compliance with the original/formally revised implementation plan for the project. The project can be presented as 'good practice'.

*Satisfactory (S):* Implementation of most components is in substantial compliance with the original/formally revised plan except for only few that are subject to remedial action.

*Moderately Satisfactory (MS):* Implementation of some components is in substantial compliance with the original/formally revised plan with some components requiring remedial action.

*Moderately Unsatisfactory (MU):* Implementation of some components is not in substantial compliance with the original/formally revised plan with most components requiring remedial action.

*Unsatisfactory (U):* Implementation of most components is not in substantial compliance with the original/formally revised plan.

*Highly Unsatisfactory (HU):* Implementation of none of the components is in substantial compliance with the original/formally revised plan.