# KFW

# Ex post evaluation – Middle East

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**Sector:** (CRS code: 72040000) Emergency food aid; 72010 for humanitarian aspects of aid for refugees and internally displaced persons (IDPs)

**Projects:** Syrian refugees crisis intervention IV (2013 66 715)\*; Syrian refugees crisis intervention (2013 66 970)\*; Stabilising neighbouring countries in the Syrian crisis II (2014 67 463)\*; Support for refugees in Iraq I (2014 68 727)\*; Strengthening resilience in the context of the Syria/Iraq crisis II (2015 67 932); Middle East: Lebanon, Strengthening the resilience of refugees in the context of the Syria/Iraq crisis II (2015 68 161)

Implementing agency: UNICEF and WFP

#### Ex post evaluation report: 2019

		WFP	UNICEF
		(planned = actual)	(planned = actual)
Investment costs (total) EU	R million	-/-**	-/-**
Counterpart contribution EU	R million	0.00	0.00
Funding EU	R million	30.00	68.00
of which BMZ budget fundsE	UR million	30.00	68.00

\*) Random sample 2019 \*\*) Total investment costs cannot be allocated

**Summary:** The civil war in Syria, which escalated in 2011, triggered an increasing influx of refugees into neighbouring countries as early as 2012. Refugee camps (Egypt and Iraq) or informal (tent) settlements (Lebanon) were set up in the border regions, and some refugees settled in existing communities. Iraq witnessed a second wave of refugees that were displaced by the Islamic State in Iraq and Syria. The influx put pressure on the already scarce resources and social infrastructure in the host countries. Financial resources were therefore channeled from BMZ via FC to UNICEF and WFP. In the case of UNICEF, basic education, sustainable water supply and sanitation, child aid measures, support and basic health care were financed in Iraq and Lebanon. In the case of the WFP, access to food and winter blankets was financed in Egypt, Iraq and Lebanon.

**Development objectives:** The projects were part of regional emergency aid programmes of the UN organisations which aimed to (1) make a contribution (impact) to improving coverage of the basic needs of refugees and host communities and (2) make a contribution to conflict mitigation. The aim at outcome level was (1) to improve access to basic education, sustainable water supply and sanitation and basic health care for refugees and the poor population in the host communities (UNICEF) and (2) to ensure the supply of food by issuing food vouchers (WFP).

Target group: Syrian refugees, host communities, but especially refugee children.

### **Overall rating: 3 (all projects)**

**Rationale:** We assess the overall result as satisfactory due to its high relevance in the acute refugee crisis, satisfactory effectiveness, high administrative costs, but speed of implementation and satisfactory impact.

**Highlights:** FC has succeeded in being effective and generating visibility quickly in the Syrian crisis by transferring FC funds to UN organisations. In Lebanon, poor sections of the population in host communities were also given access to food and services to prevent conflicts.



---- Average rating for sector (from 2007)

---- Average rating for region (from 2007)





## Rating according to DAC criteria

### **Overall rating: 3 (all projects)**

In the overall assessment, the same rating is given to all BMZ numbers. It did not make sense to differentiate by BMZ number, since different BMZ numbers were used to finance the same UN programmes and these funds cannot be allocated to individual measures. Nevertheless, the evaluation found differences in the assessment of the UN organisations involved. Country-specific evaluations were also conducted. This results in the following table with the individual ratings:

#### Ratings:

Relevance	2
Effectiveness	3
Efficiency	3
Impact	3
Sustainability	3

#### General conditions and classification of the project

The civil war in Syria, which escalated in 2011, triggered an increasing influx of refugees into neighbouring countries as early as 2012 (including Iraq and Lebanon, and to some extent Egypt too). Iraq witnessed a second wave of refugees that were displaced by the Islamic State, especially the Yazidis. The influx put pressure on the already scarce resources and social infrastructure in the host countries.

Unlike previous refugee crises, this one involved refugees from a middle-income country fleeing to middleincome countries. The vast majority of refugees (94%) did not settle in refugee camps (327,814 according to UNHCR in June 2019), but in urban areas (5,307,487 according to UNHCR in June 2019)<sup>1</sup>, a phenomenon that was new to the UN and the international donor community and for which they had little experience. The FC funds were used in Lebanon for refugees outside camps, in Egypt for refugees inside and outside of camps and in Iraq exclusively for refugees in camps.

Bilateral funds were therefore channelled by BMZ via FC to UNICEF and WFP. In the case of UNICEF, basic education, sustainable water supply and sanitation, child aid measures, support and basic health care were financed. In the case of the WFP, access to food vouchers, credit cards and winter blankets was financed. With the help of food vouchers and later credit cards, the aim was to promote the local economy and thus contribute to local conflict mitigation between refugees and host communities.

For UNICEF and WFP, these funds were allocated to a total of six UN regional programmes. The funds were used in Lebanon, Iraq and Egypt. The FC projects are part of a longer-term partnership with UN organisations, which involved significantly more FC funds, even in years when the funds evaluated here were used. The programmes of the UN organisations extended regionally beyond the three countries financed through FC.

The UN used the term "resilience" to describe the activities that benefited people in need among the host population to prevent conflict and hostility towards Syrian refugees, which was particularly relevant in Lebanon, where Syrian refugees made up 16% of the population. In total, EUR 68 million was transferred to UNICEF and EUR 30 million to WFP through the six FC projects.

One new aspect was that refugees whose basic needs were not covered in the neighbouring countries made their way to Europe and Germany, where the Syrian refugee crisis peaked in 2015 and 2016.

According to UNHCR, 6.7 million refugees fled Syria. UNHCR estimates that within Syria, there are 6.2 million internally displaced persons out of a total population of 18.5 million. Even though some Syrian ref-

<sup>&</sup>lt;sup>1</sup> Downloaded on 3 July 2019: https://data2.unhcr.org/en/situations/syria.



ugees have already spontaneously returned to Syria, it will take years before most Syrian refugees can return because of the continuing insecurity and destruction in the country and feared retaliation.

#### **Breakdown of total costs**

The overview table shows the FC funds for the six BMZ numbers included in this evaluation. The FC funds total EUR 98 million, of which EUR 68 million went to UNICEF and EUR 30 million to WFP.

	BMZ No.: 201366715	BMZ No.: 201366970	BMZ No.: 201467463		BMZ No.: 201567932	BMZ No.: 201568161
Financing for UNICEF EUR million	0.00	5.00	15.00	8.00	0.00	40.00
Financing for WFP EUR million	15.00	10.00	0.00	0.00	5.00	0.00
FC financing total EUR million	15.00	15.00	15.00	8.00	5.00	40.00
of which BMZ budget funds EUR million	15.00	15.00	15.00	8.00	5.00	40.00

The total investment costs cannot be reasonably quantified. The fiscal years of the UN organisations are not the same as for FC financing. Moreover, the evaluation only covers part of the FC projects that have provided financing for UN programmes over a certain period.

#### Relevance

The core problem of the urgent need to cover the basic needs of Syrian refugees and poor sections of the population in the host countries Egypt, Iraq and Lebanon as well as schooling for refugee children was correctly identified. All three countries had agreed to accept refugees on the condition that the international donor community would take care of their basic needs and education. Failure to cover these basic needs led Syrian refugees to embark on a dangerous voyage across the sea to Europe, which entailed high risks but also new opportunities. This is why, from the perspective of the German Federal Government, there was a pressing need to meet the basic needs of refugees in neighbouring Syrian countries both quickly and effectively.

The choice of WFP and UNICEF as implementing agencies was logical as they already had structures on the ground that could effectively implement emergency aid within a larger donor programme. The programmes, which have a similar structure to basket funding (budget assistance programmes), are based on donor appeals, as in the case of UNICEF with the "Regional Response Plan Iraq" (3RP Iraq), the "Iraq Humanitarian Response Plan" (Iraq HRP), the "No Lost Generation Strategy for Iraq" and the "Reaching all Children with Education" (RACE) programme in Lebanon. The WFP programme is based on the Regional Emergency Programme (EMOP), the "Food assistance to Vulnerable Syrian Populations in Jordan, Lebanon, Iraq, Turkey, and Egypt" and the "Emergency National Poverty Targeting Programme" (NPTP) in Lebanon. These programmes raised annual donor funds to provide basic supplies for the refugees. All of these programmes were supported by FC funds.

Key functions of the UN programmes were to raise donor funds, coordinate donors and implement the funds through local structures. With regard to influence and control, however, this meant that FC had to relinquish important control functions.

From today's point of view, it must be said that the selection of WFP as the implementing agency with its food supply was relevant. UNICEF also tackled relevant issues by providing refugees, especially children, with education, water, sanitation and health care services. With regard to cooperation with UNICEF, it should be noted that the longer-term provision of education, water, sanitation and health services was also part of the projects. In this respect, FC had an impact in terms of sustainable concepts. For example, while UNICEF originally had individual wells drilled that were not designed to meet long-term needs in an area with scarce water resources, FC experts insisted on a water supply that would ensure a sustainable supply. In this respect, the measures financed through UNICEF overlap with the approaches of bilateral



FC. However, at that time there was no viable alternative to UN funding with the speed and geographical focus required.

The impact logic of providing access to food supply, basic education, sustainable water supply, sanitation and basic health care for refugees and poor sections of the population in host communities (outcome) in order to contribute to improving the coverage of the basic needs of refugees and host communities (impact) was plausible (see Figure 1). The impact logic was reconstructed ex post for all FC projects evaluated.

#### Graph 1. Impact logic



The programme logic attached particular importance to benefiting not only the refugees but also the host communities in order to prevent conflicts, which was particularly important in Lebanon due to the high number of refugees. The exact target group was selected on the basis of data from UNHCR, which registered all refugees. However, some refugees also decided not to register and were therefore not eligible to participate in the programmes. The financing focused on supporting refugee children, meaning that refugees families in particular benefited from the support. The refugees in Iraq were housed in camps. Refugees living in Iraq outside the camps were not eligible to receive WFP provisions due to Iraqi regulations. In Lebanon, refugees lived together with the host communities in rural and urban areas. Based on previous experiences with Palestinian refugees who have not yet returned home, Lebanon is opposed to refugee camps. In Lebanon, poor sections of the population in the host communities were also included in the target group.



In short, financing via UNICEF and WFP addressed a highly relevant developmental and humanitarian problem, the Syrian refugee crisis, which is why the relevance of all FC projects evaluated is rated as good.

#### **Relevance rating: 2 (all projects)**

#### Effectiveness

The objectives at outcome level (1) to improve access to basic education, sustainable water supply and sanitation and basic health care for refugees and the poor population in the host communities (UNICEF) were mostly met in the four programmes carried out by UNICEF and, in some cases, even doubled. The objectives of (2) supplying food by issuing food vouchers or deposits on credit cards (WFP) were not achieved in terms of number by the first two programmes, but the third programme met the target by up to 92%.

The objectives at outcome level are also appropriate from today's perspective, although some of the indicators specified are not available due to a lack of baseline and target data, particularly for Iraq. Due to the existing data situation, only output data is available in some cases, but not outcome data.

The registration of refugees and poor local residents was carried out by UNHCR. Several factors played a role in target achievement, such as whether the registration of refugees was hampered by bureaucratic hurdles, whether the refugees registered or not, whether refugees unexpectedly returned to Syria as was the case in Iraq and whether the UN programmes were able to raise sufficient funds.

In the case of the financing evaluated here, FC made a contribution to dealing with the refugee crisis in the neighbouring Syrian countries. The financial contribution was low compared to the total volume of UN programmes. For example, FC's contribution to total WFP financing was only 6%. In Lebanon alone, for example, UNICEF had a budget of USD 297 million in 2012-14. It should be noted, however, that FC supported the UN programmes with additional financing over and above the projects evaluated.

The supply of food by WFP was ensured through food packets, food vouchers and, increasingly, deposits on credit cards, which was an innovation and developed pro bono by a credit card company. Research<sup>2</sup> shows that credit cards for refugees were preferred to food packets. Misuse was reduced as a result of the credit cards, refugees had more food choices and supply chains improved thanks to reliable demand. There were difficulties in individual cases, when not enough shops had credit card readers. The extent to which objectives were achieved varied from country to country.

For example, in 2013 the target figures for a project in Iraq co-financed by FC could not be met because the government decided that only refugees in camps should receive supplies and some refugees from camps in Iraq spontaneously returned to Syria. In Egypt, target figures were achieved, but funds were not spent because retailers did not renew contracts. In Lebanon the target figures were also not met as the negotiations with the government took longer than planned.

According to a study<sup>3</sup> conducted for Lebanon, which did not measure the FC projects directly but had a similar content, the food voucher/credit card system had a positive impact on the local economy and created jobs. However, the supply of goods in Lebanon deteriorated due to the close economic ties with Syria. Food Consumption Scores (FCS), which measure the volume and diversity of food rations, have improved as a result of the programme in Egypt and Iraq, while in Lebanon no improvement was measured at the time of the study in 2013, as the registration of refugees by the authorities and thus supply took longer than planned.

According to a report on one of the FC projects (BMZ No.: 2013 66 970), even though there were some price increases in remote locations in Lebanon, WFP worked under contract with around 400 retailers in 2016. This reduced market concentration and food prices through discounts for Syrian refugees. In Leba-

<sup>&</sup>lt;sup>2</sup> Christian Lehmann and Daniel T. R. Masterson (2015). Impact evaluation of a cash-transfer programme for Syrian refugees in Lebanon. Field Exchange 48, November 2014. p. 56. www.ennonline.net/fex/48/impactevaluation.

<sup>&</sup>lt;sup>3</sup> Christian Lehmann and Daniel T. R. Masterson (2015). Impact evaluation of a cash-transfer programme for Syrian refugees in Lebanon. Field Exchange 48, November 2014. p. 56. www.ennonline.net/fex/48/impactevaluation.



non, the food supply for Syrian refugees deteriorated slightly at the beginning of 2016 due to underfunding by donor countries. However, at the end of the year, the percentage of families with low FCS decreased by 3 percentage points and the percentage of families with adequate food availability increased by 12 percentage points compared to the start of EMOP, one of WFP's programmes.

In the refugee camps in Iraq, UNICEF improved access to school education, water, sanitation and waste water and waste disposal. In addition, supporters were trained in hygiene education. Also in Iraq, new schools were built and existing schools expanded with container structures. Youth cafes for further education and child shelters were set up, offering childcare, remedial lessons during the summer and psychological care for children and young people who had experienced violence and serious abuse. In addition, funding was provided for vaccination campaigns and events dealing with how to prevent abuse. These are primarily output and not outcome factors, but the evaluation relies on existing data.

In Lebanon, the water supply was improved by strengthening pumping capacity and reducing water losses as well as by building a reservoir. Waste disposal has also been improved following complaints from the local population. The school infrastructure was improved and two shifts of lessons were introduced. Syrian refugees were provided with learning materials and winter blankets. Informal training courses were also established. Also in Lebanon, bus transport increased the safety of school attendance.

We consider a satisfactory rating to be justified on the basis of target achievement or overachievement in the areas of education and water supply and sanitation and target underachievement in the area of food security.

#### Effectiveness rating: 3 (all projects)

#### Efficiency

Two aspects are particularly relevant in the evaluation of efficiency. (1) Rapid implementation in the refugee crisis and (2) efficient use of resources.

Given the urgency of the matter, the decision to fund WFP- and UNICEF-led programmes made sense, especially as Lebanon and, to a lesser extent, Iraq had transferred responsibility for meeting the basic needs of refugees to the UN. In this respect bilateral fund allocation, which would have used limited bilateral funds for refugees, was not possible at the time and not sought by the respective governments. From today's perspective and given that refugees spend an average of 17 years abroad and that infrastructure therefore has to be designed on a longer-term basis, bilateral aid with the professional expertise of traditional FC would also be appropriate, where infrastructure like water supply and sanitation facilities as well as school construction is involved. In terms of infrastructure, FC has medium- and long-term development expertise that UN organisations specialising in emergency aid and short-term effectiveness did not or did not yet have.

The instrument of anticipated appraisal followed by the subsequent definition of the allocation of funds by WFP and UNICEF in accordance with the project proposals enabled disbursements to be processed quickly. The implementation and completion of the first three projects were delayed by 6, 1 and 7 months respectively, while the last three were completed on schedule and the RACE project in Lebanon even finished three months ahead of schedule.

The projects were expensive in terms of resources and production efficiency. FC funds were first channelled to UN organisations, which retained 7-8% of the administrative costs. In many cases, UN organisations transferred funds to international and local NGOs for implementation. Both international and local NGOs, for their part, needed appropriate administrative costs. According to one study, administrative costs are therefore particularly expensive for projects handled through UN agencies and can be as high as 60% compared to other projects handled by bilateral and multilateral organisations, ranging from 6% to 43% (Palagashvili and Williamson, 2014). However, an evaluation of administrative costs must take into account that all projects in a fragile context tend to be more expensive due to the increased risks.

Financing from individual FC projects in regional UN programmes entails a certain amount of "earmarking" of FC funds. This must be viewed critically from an efficiency standpoint, as it involves higher administrative costs. However, a positive aspect in this context is that FC's targeted commitment also increased the



quality of UN programmes, e.g. with regard to sustainable solutions. KfW also succeeded in securing funds for Yazidis in Iraq, who would otherwise not have received targeted support.

Due to high administrative costs and thus low production efficiency, but adequate allocation efficiency (relevant starting points, positive target achievement) and speed of implementation, we rate the result as satisfactory. We rate the projects funded through WFP as positive due to the innovation of credit card payments and the greater efficiency associated with this. Overall, efficiency is thus deemed satisfactory.

#### Efficiency rating: 3 (all projects)

#### Impact

The objective set for the evaluation at impact level was (1) to contribute to improving coverage of the basic needs of refugees and host communities and (2) to contribute to conflict mitigation.

UNICEF's focus on **education** has partly prevented a generation of refugees from being deprived of access to education by the conflicts in Syria and Iraq. According to information from UNICEF, more than 2 million Syrian refugee children of school age did not attend school in 2018 (36%). However, this also means that the majority of school-age refugee children (64%) did go to school. Two shifts of lessons in Lebanon and the renovation of schools contributed to the overall improvement of the public school system. Schools in Iraq provided stability in the lives of refugee children, and teachers acted as persons of trust. What was not sufficiently considered, however, was the low level of teacher qualification, which affected the quality of teaching and learning outcomes. According to a study from 2014<sup>4</sup>, the failure rate for Syrian refugee children was twice as high as the national average. But this also shows how, despite international financing, a model for education in crisis situations needs further development.

Tensions between Syrian refugees and host communities have eased from the outset thanks to a preventive approach by WFP and UNICEF, which at least in Lebanon supported Syrian refugees and poor sections of the population in host communities. Neither Lebanon nor Iraq experienced major conflicts between Syrian refugees and host communities during the war in Syria, even though restrictions on work permits reduced wages and put refugees, especially children, in precarious situations because of low-paid child labour. However, the situation deteriorated after the violent clashes ended, when Syrian refugees were expelled from the country and the tolerance of the host communities diminished.<sup>5</sup>

In the Syrian refugee crisis, involving countries of origin and destination with middle-income refugees, malnutrition was not the main problem to the same extent as in refugee crises in extremely poor regions (Hossain 2016). This was also a result of WFP issuing deposits on credit cards for basic provisions for refugees, which, unlike food packets, allowed them to choose their own fresh produce and meat. Surveys found that when the vouchers were reduced (due to underfunding), undernourishment ensued.

According to research<sup>6</sup>, while Syrian refugees in Lebanon have lowered wages, exacerbated unemployment and caused the informal sector to expand, the large increase in the population has also put considerable strain on infrastructure, services and resources. Overall, however, the refugees have boosted the country's economy through the demand for food, services and the payment of rents, including humanitarian aid, which has flowed into the country, thereby offsetting the negative impact of the Syrian crisis on the economy.

The child protection zones in Iraq were evaluated by a study conducted by Save the Children, UNICEF and Columbia University. Surveys conducted in 2013 and 2014 showed that although the centres' support has improved learning outcomes and overall well-being, including through sport, music and parental sup-

<sup>&</sup>lt;sup>4</sup> Maha Shuayb, Nisrine Makkouk and Suha Tuttunji. 2014. Widening Access to Quality Education for Syrian Refugees: The Role of Private and NGO Sectors in Lebanon. Center for Lebanese Studies. Beirut, Lebanon. https://lebanesestudies.com/wp-content/uploads/2014/09/Widening-Access-to-Quality-Education-for-Syrian-Refugees-the-role-private-and-NGO-sectors-in-Lebanon-.pdf.

<sup>&</sup>lt;sup>5</sup> No refuge. Politicians are stoking anti-refugee sentiment in Lebanon. A wave of nativist ire has left Syrians with nowhere to turn. The Economist. 22 Aug. 2019, Beirut, Lebanon.

<sup>&</sup>lt;sup>6</sup> Christian Lehmann and Daniel T. R. Masterson (2015). Impact evaluation of a cash-transfer programme for Syrian refugees in Lebanon. Field Exchange 48, November 2014. p. 56. www.ennonline.net/fex/48/impactevaluation.



port, it has not reduced negative attitudes and coping mechanisms such as child marriage, entry into armed forces, migration and child labour (Lilley, Sarah et al. 2014).

Since a positive impact on meeting the basic needs of Syrian refugees and host communities and their living conditions can be demonstrated on the basis of literature and interviews, we consider a satisfactory overall result to be justified.

#### Impact rating: 3 (all projects)

#### **Sustainability**

Since all six programmes were characterised by the provision of urgent relief (Emergency procedure for natural catastrophes, crises and conflicts in accordance with TC 47 in the FC-TC Guideline), they had limited sustainability requirements.

The school buildings planned and implemented by **UNICEF** increased the safety and quality of the infrastructure in Lebanon and Iraq and made public schools more attractive, also for local children. Greater compatibility of the water supply measures in Lebanon with follow-up projects is ensured by FC in Lebanon, providing clear added value to the projects from the FC participation. FC's contribution to establishing solutions that are more sustainable than originally planned can be rated positively from the point of view of sustainability. The educational offerings, which were intended to prevent a "lost generation", can have a lasting effect on pupils, which can be built on by continuing to attend school.

The cash transfers planned and implemented by **WFP** had the potential to enable people in need to improve their food situation on a slightly longer-term basis than is possible with direct food aid, although no sustainable structures are established through this approach.

Certain sustainable effects also apply to the measures to strengthen resilience for the host communities in Lebanon, even though there were delays in implementation there.

In all six projects the governmental structures were integrated as far as possible, which enabled the issues of nutrition, education and hygiene to be further embedded. The high level of donor involvement in this region offers a wide range of approaches by means of more extensive financing for the measures evaluated here, so that their impacts are not lost.

Sustainability therefore corresponded to the expectations for this kind of measures.

Sustainability rating: 3 (all projects)



#### Notes on the methods used to evaluate project success (project rating)

Projects (and programmes) are evaluated on a six-point scale, the criteria being **relevance**, **effectiveness**, **efficiency** and **overarching developmental impact**. The ratings are also used to arrive at a **final assessment** of a project's overall developmental efficacy. The scale is as follows:

Level 1	Very good result that clearly exceeds expectations
Level 2	Good result, fully in line with expectations and without any significant shortcomings
Level 3	Satisfactory result – project falls short of expectations but the positive results dominate
Level 4	Unsatisfactory result – significantly below expectations, with negative results dominating despite discernible positive results
Level 5	Clearly inadequate result – despite some positive partial results, the negative results clearly dominate
Level 6	The project has no impact or the situation has actually deteriorated

Rating levels 1-3 denote a positive assessment or successful project while rating levels 4-6 denote a negative assessment.

#### Sustainability is evaluated according to the following four-point scale:

Sustainability level 1 (very good sustainability): The developmental efficacy of the project (positive to date) is very likely to continue undiminished or even increase.

Sustainability level 2 (good sustainability): The developmental efficacy of the project (positive to date) is very likely to decline only minimally but remain positive overall. (This is what can normally be expected).

Sustainability level 3 (satisfactory sustainability): The developmental efficacy of the project (positive to date) is very likely to decline significantly but remain positive overall. This rating is also assigned if the sustainability of a project is considered inadequate up to the time of the ex post evaluation but is very likely to evolve positively so that the project will ultimately achieve positive developmental efficacy.

Sustainability level 4 (inadequate sustainability): The developmental efficacy of the project is inadequate up to the time of the ex post evaluation and is very unlikely to improve. This rating is also assigned if the sustainability that has been positively evaluated to date is very likely to deteriorate severely and no longer meet the level 3 criteria.

The **overall rating** on the six-point scale is compiled from a weighting of all five individual criteria as appropriate to the project in question. Rating levels 1-3 of the overall rating denote a "successful" project while rating levels 4-6 denote an "unsuccessful" project. It should be noted that a project can generally be considered developmentally "successful" only if the achievement of the project objective ("effectiveness"), the impact on the overall objective ("overarching developmental impact") and the sustainability are rated at least "satisfactory" (level 3).