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MIDTERM EVALUATION

USAID/Vietnam Trade Facilitation Program

December 2021

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USAID/Vietnam Trade Facilitation Program

USAID Learns

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Prepared for:

Le Tong Giang, Contracting Officer's Representative (COR)
United States Agency for International Development/Vietnam
15/F, Tung Shing Square
2 Ngo Quyen Street
Hoan Kiem District
Hanoi, Vietnam

Prepared by:

USAID Learns
Social Impact, Inc.
Level 6, BIDV Tower
194 Tran Quang Khai Street
Hoan Kiem District
Hanoi, Vietnam

ABSTRACT

This midterm evaluation report is about the progress of a five-year trade-related technical assistance program in Vietnam, the Trade Facilitation Program (TFP) funded by USAID. It was evaluated after three years of implementation. TFP aims to support Vietnam to adopt and implement a risk-based approach to customs, which will facilitate the implementation of the World Trade Organization's (WTO) Trade Facilitation Agreement (TFA). The underlying theory of change (TOC) is that by harmonizing and simplifying national policies and procedures, strengthening national-provincial coordination as well as strengthening provincial coordination, and partnerships between customs and the private sector, the program would contribute to expediting cross-border trade and enable Vietnam's ability to implement WTO TFA commitments. The program targets six provinces: Ha Noi, Hai Phong, Quang Tri, Da Nang, Dong Nai and Ho Chi Minh City. Evaluation questions covered the progress toward the program's purpose, the extent to which coordination at central and provincial levels as well as central-provincial level were strengthened, and to identify drivers of progress in a trade facilitation system, assess the program's gender-responsiveness, and lessons learned. The evaluation used the 5Rs Framework which is part of USAID's Collaboration, Learning and Adaptation tools to assess Vietnam's trade facilitation system through the lens of results, roles, relationships, rules, and resources. Evaluation methods consisted of document research, an online survey of 210 program participants, 46 key informant interviews, and three focus group discussions. There is evidence that the program made considerable contributions to harmonized and simplified policies and procedures across the government in specialized inspection (SI) reform, risk management, and customs procedures. It laid a foundation for strengthening national-provincial coordination indicated by an improved compliance at the provincial level. Though the program strengthened stakeholders in some targeted provinces, it found flexible pathways to facilitate provincial implementation. The program enhanced partnerships between customs and the private sector and leveraged private sector knowledge and communication, especially at the national level.

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ACRONYMS

AMELP	Activity Monitoring, Evaluation, Learning and Action Plan
ASEAN	Association of Southeast Asian Nations
C2B	Customs-to-Business
CAPCI	Assessment of Compliance Costs of Administrative Procedures in Customs
CCS	Customs Control and Supervision Department
CDCS	Country Development and Cooperation Strategy
CIEM	Central Institute for Economic Management
COR	Contracting Officer's Representative
COVID-19	Coronavirus Disease 2019
CSS Procedures	Customs [Business] Satisfaction Survey with Import-Export Administrative Procedures
DO	Development Objective
eLMS	electronic Learning Management System
FGD	Focus Group Discussion
FY	Fiscal Year
GDVC	General Department of Vietnam Customs
GIG	Governance for Inclusive Growth
GVN	Government of Vietnam
ITCS	Information Technology and Customs Statistics
IP	Implementing Partner
IR	Intermediate Result
IT	Information Technology
KII	Key Informant Interview
MARD	Ministry of Agriculture and Rural Development
MEL	Monitoring, Evaluation, and Learning
MOF	Ministry of Finance
MOIT	Ministry of Industry and Trade
MOJ	Ministry of Justice
MOT	Ministry of Transport
MOU	Memorandum of Understanding
NSW	National Single Window
NTFC	National Trade Facilitation Committee
ODA	Official Development Assistance
OOG	Office of the Government
PMU	Program Management Unit
PPC	Provincial People's Committee
PTFC	Provincial Trade Facilitation Committee
RMD	Risk Management Department
SI	Social Impact, Inc; Specialized Inspection
SMEs	Small and Medium-sized Enterprises
SOW	Statement of Work
SPS	Sanitary and Phytosanitary
TFA	Trade Facilitation Agreement
TFP	Trade Facilitation Program
TOC	Theory of Change

USAID	United States Agency for International Development
USD	United States Dollar
USG	United States Government
VAAWE	Vietnam-ASEAN Association for Women Entrepreneurs
VBF	Vietnam Business Forum
VCCI	Vietnam Chamber of Commerce and Industry
VCS	Vietnam Customs School
WCO	World Customs Organization
WTO	World Trade Organization

EXECUTIVE SUMMARY

BACKGROUND AND PURPOSE

As Vietnam rapidly grows its trade, red tape and cumbersome border measures and procedures are increasingly becoming an impediment to its trade competitiveness. In addition to customs and border measures, lack of adequate coordination are the main sources of long delays of border crossing, thus increasing the costs for traders, particularly for small and medium-sized enterprises (SMEs) and women-owned/operated businesses.¹ Approximately 30–35 percent of imported and exported goods are subject to specialized inspections (SIs).²

In December 2013, the World Trade Organization (WTO) members concluded the negotiations of the Trade Facilitation Agreement (TFA), which entered into effect in February 2017. Vietnam ratified it on December 15, 2015³ and made its full commitment to implement the measures. Vietnam also identified measures with which Vietnam required external technical assistance for implementation. The risk management approach to customs and SIs is one of them.⁴

To assist Vietnam, the United States Agency for International Development (USAID) initiated the Trade Facilitation Program (TFP). TFP is a five-year trade-related technical assistance program with a ceiling of United States Dollar (USD) \$21.8 million, funded by USAID and implemented by Nathan Associates, Inc. from May 2018 to May 2023. The Ministry of Finance (MOF) is the agency in charge and approved TFP in July 2019 as an Official Development Assistance (ODA) project.⁵ The General Department of Vietnam Customs (GDVC) is TFP's main counterpart. GDVC is responsible for customs and trade facilitation matters and is the focal point of the National Trade Facilitation Committee (NTFC).

Theory of Change [TOC] (Program Logic): The program aims to support Vietnam to adopt and implement a risk-based approach to customs, which will facilitate the implementation of the WTO TFA. The program's purpose is: (1) Expedite cross-border trade; and (2) enable Vietnam's ability to implement WTO TFA commitments. The underlying TOC to achieve the purpose is: By harmonizing and simplifying policies and procedures across government units, strengthening national-provincial coordination as well as provincial level implementation and inter-provincial coordination, and enhancing partnerships between customs and the private sector, the program would contribute to expediting cross-border trade and enable Vietnam's ability to implement WTO TFA commitments. The program targets six provinces: Ha Noi, Hai Phong, Quang Tri, Da Nang, Dong Nai, and Ho Chi Minh City.

After three years of implementation, USAID/Vietnam requested USAID Learns to conduct a midterm evaluation of TFP. The purpose of the evaluation is to provide an independent and in-depth review of the overall progress of TFP in Vietnam as well as examining the activity's design and progress in addressing Government of Vietnam (GVN)'s priorities and private sector's needs to expedite cross-border trade and enhance trade facilitation. This evaluation took place from June 2021 to December 2021.

The midterm evaluation is guided by five evaluation questions (EQs):

¹ Deprez, S. The Strategic Vision behind Vietnam's International Trade Integration. *Journal of Current Southeast Asian Affairs*. 2018;37(2):3–38. doi:[10.1177/186810341803700201](https://doi.org/10.1177/186810341803700201)

² VCCI, 2020. *Business Satisfaction on Import-Export Administrative Procedures*. Available at [PDE](#).

³ WTO, 2021. *Trade Topics; Trade facilitation* (online). Available at [wto.org](https://www.wto.org).

⁴ Ibid.

⁵ Source: Project document of the Technical Assistance project on Trade Facilitation, signed July 2019, section I.

- EQ 1: Progress toward Program Purpose: How well does the activity align with government and private sector needs to expedite cross-border trade?
- EQ 2: To what extent has the activity helped to improve inter-agency coordination at central and provincial levels and central-provincial coordination to expedite trade?
- EQ 3: Drivers of Progress: What are the driving factors influencing or inhibiting progress to date, particularly in customs and trade facilitation systems?
- EQ 4: Cross-cutting issue: To what extent has the activity been gender-responsive in its design and implementation?
- EQ 5: Lessons learned: What are the main lessons learned from TFP's successes and challenges related to trade facilitation?

Key audience for the evaluation is USAID/Vietnam, the Implementing Partner (IP), the MOF, and GDVC for evidence-based decision making on key leverage points to prioritize for the remaining 20 months of TFP, and for USAID's future programming.

METHODS

The evaluation employed a mixed-methods approach to obtain reliable data pertinent to each EQ:

- Document review of program documents, assessment reports, surveys, and legal documents
- Online survey of 210 participants of TFP activities
- 46 key informant interviews (KIIs)
- Three focus group discussions (FGDs) with 23 participants
- A consultation workshop to validate initial findings.

The evaluation applied USAID's 5Rs Framework⁶ as a lens to assess TFP's performance and progress from different angles (Results, Roles, Relationships, Rules, Resources). In an evaluation, the 5Rs Framework helps to look systematically at how local actors engage, and which resources and rules affect their interaction. It helps to evaluate how local systems can be strengthened more effectively and thus realize sustained results more consistently. The 5Rs Framework has been introduced by USAID in the Local Systems Framework to promote good systems practice.⁷

Due to Coronavirus 2019 (COVID-19) restrictions, interviews and FGDs were conducted virtually which may have affected the openness of some stakeholders to share their views. There was also a challenge to recruit enterprises for KIIs and FGDs. Some FGDs had overrepresentation of the public sector which may have caused private sector representatives to be less frank.

FINDINGS AND CONCLUSIONS

EQ 1: Progress toward Program Purpose: How well does the activity align with government and private sector needs to expedite cross-border trade?

The program is well-aligned with government and private sector needs to expedite cross-border trade and Vietnam's ability to implement WTO TFA commitments. Progress under TFP's individual four components contributed to progress toward the program's purposes: There is evidence that (1) the program made considerable contributions to harmonized and simplified policies and procedures across the government in SI reform, risk management and customs procedures. (2) The program laid a foundation for strengthening national-provincial coordination through its legal reform and provincial assessments activities. (3) The program strengthened provincial level implementation in targeted provinces and improved capacities in SI and risk management. TFP successfully piloted public-private

⁶ For more information: Technical Note 5Rs Framework:

https://usaidlearninglab.org/sites/default/files/resource/files/5rs_technical_note_ver_2_1_final.pdf

⁷ Technical Note 5Rs Framework, p1.

sector interaction that can trigger future private sector engagement. (4) The program enhanced partnerships between customs and the private sector and leveraged private sector knowledge. At the provincial level, local authorities prioritize investment promotion which affected buy-in into TFP's provincial trade facilitation work. To further expedite cross-border trade and Vietnam's ability to implement WTO TFA commitments, the evaluation identified a number of areas for improvements including: (i) limited influence on the improvement of NTFC's function; (ii) the voice of the private sector hasn't been adequately leveraged at the NTFC's meetings; (iii) continue support on harmonization of SI, focusing on implementing procedure at the provincial level for improved compliance; (iv) public-private sector interaction at the provincial level needs to be enhanced at the provincial level; (v) limited policy advocacy capacities of business associations.

EQ 2: To what extent has the activity helped to improve inter-agency coordination at central and provincial levels and central-provincial coordination to expedite trade?

One of the key objectives of WTO TFA and TFP is to facilitate trade in goods and services by promoting coordination between customs with other competent authorities, and compliance with regulations. The program provided substantial support to the customs system and some technical support to line ministries. Given the support to the NTFC and the practical support to establishing provincial trade facilitation committees (PTFCs), the program has laid the foundation for inter-agency coordination and harvested some initial results. Fragmented government actions from national to provincial levels regarding trade facilitation remain challenges to the program's expected outcome and progress. Working with NTFC as the main avenue for trade facilitation coordination is the "right" strategy but not comprehensive enough to introduce change and the required improvement in coordination. Given the limited resources at national and provincial levels for coordinating trade facilitation, the provincial level needs to be included in the program's remaining life through locally embedded trade facilitation initiatives.

The official approval for the program was granted in July 2019, and the COVID-19 outbreak shortly afterward delayed the program's preparatory assessments for activities with stakeholders at the provincial level. This appears to have contributed to challenges in getting buy-in from provincial stakeholders. Progress in improving national-provincial coordination cannot be clearly observed. PTFCs/mechanisms were established in three of the six targeted provinces. Respondent feedback was inconclusive on whether the program should try to adopt the model in all six of them. As a result, a flexible approach may be the best option for TFP in the practical context. Respondent feedback highlights the urgency and importance of continuing dialogue at the central level with line ministries to develop a platform for the implementation of the new SI Decree. Engaging with the private sector is an objective and also an instrument to integrate state agencies vertically and horizontally, given their accountability towards businesses. Investment in stakeholder coordination is important for TFP moving forward to achieve its purpose.

EQ 3: Drivers of Progress: What are the driving factors influencing or inhibiting progress to date, particularly in customs and trade facilitation systems?

The drivers of progress are identified through the 5Rs lens (Results, Roles, Relationships, Rules, and Resources). In terms of **results**, the reform in customs procedures and SI, with TFP's technical assistance, is a remarkable achievement, with the National Single Window (NSW) continuing to be the key focus of NTFC's agenda. GDVC took an important and leading **role** in customs modernization and trade facilitation of Vietnam, while the NTFC, who should have been a key actor in the progress, did not demonstrate its true functions. To understand **relationship** dynamics, there has been weak interaction among government agencies in promoting the mandates and responsibilities of the NTFC. At the provincial level, mirroring the national trade facilitation mechanism would limit the utilization of existing provincial trade facilitation mechanisms. The program assisted in simplification and

harmonization of trade related **rules**. Respondents identified the need for more channels and platforms that help the private sector and relevant stakeholders to exchange updated information related to customs and trade laws and regulations. Applying a system lens, the improvements in relationship, roles and rules has created a foundation for TFP to drive momentum and consensus on trade facilitation priorities and reform which can support greater progress in the areas of resources and results.

EQ 4: Cross-cutting issue: To what extent has the activity been gender-responsive in its design and implementation?

The program follows a regular approach in gender, covering necessary steps with sex-disaggregated data collected. According to the program's sources, nearly fifty percent of TFP's training and event participants were female (47 percent out of total 4,625 participants). TFP also conducted gender training for TFP staff and GDVC staff. For the first time, gender questions were included in the 2020 Customs Business Satisfaction Survey (CSS) and related data analyzed. However, it seems gender is considered "neutral" in the program because of the nature of the customs work, and activities are not designed and implemented through a gender lens. Sex-disaggregated data are not categorized into different groups to understand possible problems for each specific group/category. There has been no stand-alone gender-based activity or cooperation with women-led associations to pilot outreach women empowerment in trade.

EQ 5: Lessons learned: What are the main lessons learned from TFP's successes and challenges related to trade facilitation?

Using the 5Rs lens, the following lessons emerged:

Lessons learned from TFP's successes

Lesson 1: Promulgation of *general* laws/regulations is an effective approach to address impediments to trade and business environment set forth by *specific* laws/regulations. (Rules/Results)

Lesson 2: Investment in building trust and relations with host and sponsoring agencies is one key determinant to program success. (Resources/Relationships)

Lesson 3: A powerful champion is necessary in triggering reform. (Roles/Rules)

Lessons learned from TFP's challenges

Lesson 4: Fragmented governance can be solved by joined action of agencies and coherent policy. (Roles/Relationships/Rules)

Lesson 5: If donor proposals for local activities are not aligned with local conditions and priorities are not harmonized with the national agenda, it can adversely affect local trade facilitation initiatives. (Roles/Resources/Results)

Lesson 6: Highly technical programs can also benefit from a gender responsive approach that enhances program effectiveness and achieves better results. (Roles/Results)

RECOMMENDATIONS

Recommendation 1: Strengthen NTFC's function by activating working level networks between NTFC's member ministries and the private sector, leveraging the voice of the private sector.

Recommendation 2: Promote provincial trade facilitation by addressing provincial trade facilitation initiatives in a bottom-up approach, ensuring effective private sector representation.

Recommendation 3: Further harmonize procedures and strengthen compliance by assisting other line ministries involved in SIs and providing training on general risk management for more compliance at central and provincial levels.

Recommendation 4: Enhance customs and private sector partnerships, expanding them beyond customs, and assist ministries to communicate with businesses and build capacities of business associations.

Recommendation 5: Strengthen gender-responsiveness by adapting a more gender-responsive approach in the design and implementation of activities in remaining annual work plans.

Recommendation 6: USAID to engage the Vietnam local system to adapt or respond to reform by investing sufficient time and resources on relationships or trust building prior to program design and during implementation.

Recommendation 7: USAID to support the promulgation of general laws/regulations as an effective approach to address the impediments to trade and business environment caused by conflicting, specific laws/regulations. A general law, such as the SI Decree, would effectively supersede specialized regulations.

INTRODUCTION

CONTEXT

As Vietnam rapidly grows its trade, red tape and cumbersome border measures and procedures are increasingly becoming an impediment to its trade competitiveness.⁸ In addition to customs and border measures, it appears that the health, sanitary, and phytosanitary (SPS) measures and other specialized inspections⁹ (SIs) that lack adequate coordination are the main sources of long delays of border crossing, thus increasing the costs for traders, particularly for small and medium-sized enterprises (SMEs) and women-owned/operated businesses.¹⁰ About 19 percent of international shipments are subject to SIs according to the latest statistics by GDVC.¹¹ The complexity of Vietnam's customs rules and procedures, their lack of coordinated border management with other line ministries/agencies in the trade facilitation system, and their inconsistent application across Vietnam make it harder for enterprises to trade internationally.

In December 2013, the World Trade Organization (WTO) members concluded the negotiations of the Trade Facilitation Agreement (TFA), which entered into effect in February 2017 after two-thirds of WTO members completed their domestic ratification process.¹² Vietnam ratified the TFA on December 15, 2015 and made its full commitment to the implementation of 36 trade facilitation measures embedded in the TFA. Vietnam also identified nine trade facilitation measures as Category C measures with which Vietnam required external technical assistance for implementation.¹³ The risk management approach to customs and SIs is one of the Category C measures included in Vietnam's TFA implementation schedule.¹⁴

BACKGROUND

To assist Vietnam, the United States Agency for International Development (USAID) initiated the Trade Facilitation Program (TFP). TFP is a five-year trade-related technical assistance program with a ceiling of United States Dollar (USD) \$21.8 million, funded by USAID and implemented by Nathan Associates, Inc. from May 2018 to May 2023. The Ministry of Finance (MOF) is the agency in charge and approved TFP in July 2019 as an Official Development Assistance (ODA) project.¹⁵ The General Department of Vietnam Customs (GDVC) is TFP's main counterpart. GDVC is responsible for customs and trade facilitation matters and is the focal point of the National Trade Facilitation Committee (NTFC). There are also around 20 Vietnamese central government agencies involved in trade facilitation matters, and most of these agencies are members of the NTFC. The Vietnam Chamber of Commerce and Industry (VCCI) is also a member of the NTFC, and the sole representative for the private/business sector on trade facilitation in the NTFC.

⁸ Deprez, S. The Strategic Vision behind Vietnam's International Trade Integration. *Journal of Current Southeast Asian Affairs*. 2018;37(2):3–38. doi:10.1177/186810341803700201

⁹ According to the VCCI, different specialized inspections (SI) in Vietnam can be conceptualized as follows:

1. Cargo quality management (e.g., licensing/equivalent documentation procedures, conformity declaration procedures and quality inspection procedures)
2. Food safety management (e.g., licensing/equivalent documentation and conformity declaration procedures)
3. Other specialized management (e.g., phytosanitary, animal quarantine and cultural inspection).

Each of these procedures is linked to a number of related ministries and sectors such as MOIT, MOST, MARD, MIC and MOH, among others.

¹⁰ VCCI, 2020. Business Satisfaction on Import-Export Administrative Procedures. Available at [PDF](#).

¹¹ Data confirmed by Central Institute for Economic Management (CIEM), 2021

¹² WTO, 2021. Trade Topics; Trade facilitation (online). Available at [wto.org](#).

¹³ WTO, 2021. Trade Facilitation Agreement Database, Status of Vietnam's Commitments, and Implementation. Available at [tfadatabase.org](#).

¹⁴ Ibid.

¹⁵ Source: Project document of the Technical Assistance project on Trade Facilitation, signed July 2019, section I.

Theory of Change [TOC] (Program Logic): The program aims to support Vietnam to adopt and implement a risk-based approach to customs, which will facilitate the implementation of the WTO TFA. The program's purpose¹⁶ is: (1) Expedite cross-border trade and (2) enable Vietnam's ability to implement WTO TFA commitments. The underlying TOC to achieve the purpose is through four components with the following intermediate results (IRs): By harmonizing and simplifying policies and procedures across government units, strengthening national-provincial coordination as well as provincial level implementation and inter-provincial coordination, and enhancing partnerships between customs and the private sector, the program would contribute to expediting cross-border trade and enable Vietnam's ability to implement WTO TFA commitments. The program targets six provinces: Ha Noi, Hai Phong, Quang Tri, Da Nang, Dong Nai and Ho Chi Minh City. The Results Framework in Annex III shows linkages between key outputs, IRs and the higher-level outcomes of TFP.

PURPOSE AND AUDIENCE

After three years of implementation, USAID/Vietnam requested USAID Learns to conduct a midterm performance evaluation of TFP. The purpose of the evaluation is to provide an independent and in-depth review of the overall progress of TFP in Vietnam as well as examining the activity's design and progress in addressing Government of Vietnam (GVN)'s priorities and private sector's needs to expedite cross-border trade and enhance trade facilitation. The evaluation also identifies lessons for implementation improvement and future design. This evaluation took place from June 2021 to December 2021. Key audience for the evaluation is USAID/Vietnam, the Implementing Partner (IP), MOF and GDVC for evidence-based decision making on key leverage points to prioritize for the remaining 20 months under TFP.

EVALUATION QUESTIONS

The midterm evaluation is guided by five evaluation questions (EQs):

- EQ 1: Progress toward Program Purpose: How well does the activity align with government (central and provincial) and private sector needs to expedite cross-border trade?
- EQ 2: Progress toward IR 2 and 3: To what extent has the activity helped to improve inter-agency coordination at central and provincial levels and central-provincial coordination to expedite trade? What are the obstacles and opportunities for improvement, especially from the GVN point of view?
- EQ 3: Drivers of Progress: What are the driving factors influencing or inhibiting progress to date, particularly in customs and trade facilitation systems?
- EQ 4: Cross-cutting issue: To what extent has the activity been gender-responsive in its design and implementation?
- EQ 5: Lessons learned: What are the main lessons learned from TFP's successes and challenges related to trade facilitation?

OVERVIEW AND DESCRIPTION OF THE REPORT

The evaluation report presents the methodology, followed by findings and conclusions for each EQ, and recommendations. For a quick overview, there are three annexes that are useful for the reader to look at: Results Framework (Annex III) with a summary of the program's progress to date and areas for improvement, a stakeholder matrix (Annex IV), and a stakeholder map of the Vietnam trade facilitation system with key actors and their linkages (Annex V).

¹⁶ The program objective is differently formulated in the (1) ODA approval document, (2) the contract for technical assistance and the (3) AMELP. The evaluation will use the program purpose as defined in the AMELP that is also referred to in the program reports.

METHODOLOGY

OVERVIEW

The evaluation employed a mixed-methods approach to obtain reliable data pertinent to each EQ: Document review, an online survey, key informant interviews (KIIs), focus group discussions (FGDs), and a consultation workshop.

The evaluation utilized USAID's 5Rs Framework as a lens to assess TFP's performance and progress from different angles (Results, Roles, Relationships, Rules, Resources). The 5Rs Framework places local systems at the center of all interventions because local ownership and coordination are key determinants to program effectiveness and sustainability. In an evaluation, the 5Rs Framework helps to look systematically at how local actors engage, and which resources and rules affect their interaction. It helps to evaluate how local systems can be strengthened more effectively and thus realize sustained results more consistently. The 5Rs Framework has been introduced by USAID in the Local Systems Framework to promote good systems practice.¹⁷ The framework is best applied during the design of an activity (which it was not for TFP) but can also be insightful as an analysis framework during evaluations to inform where to strengthen intervention in the local system in the final years of implementation.

EVALUATION DESIGN

Table 1 shows the sampling strategy. As the program targets six provinces, the evaluation included representatives from each target province in the online survey, KIIs, and FGDs. Respondents sampled reflect the different stakeholder groups or beneficiaries involved in the program.

Table 1: Sampling Strategy

Respondent Category	Online Survey		KIIs		FGD Participants	
	Number	Percent	Number	Percent	Number	Percent
GVN Ministries, Agencies	13	6.2	3	6.5	0	0
GDVC	59	28.1	12	26.1	16	69.6
Provincial People's Committee (PPC)	0	0.0	0	0.0	0	0.0
Provincial Customs Departments	64	30.5	4	8.7	2	8.7
Other provincial GVN Departments/Agencies	0	0.0	1	2.2	0	0.0
Business associations	8	3.8	3	6.5	2	8.7
Domestic import-/export-oriented companies	19	9.1	3	6.5	2	8.7
Foreign companies	26	12.4	2	6.5	--	--
Research, higher education, TVET institution	2	1.0	1	2.2	1	4.3
Others	19	9.1	16	34.8	--	--

¹⁷ For more information: Technical Note 5Rs Framework: https://usaidlearninglab.org/sites/default/files/resource/files/5rs_technical_note_ver_2_1_final.pdf

Respondent Category	Online Survey		KIIs		FGD Participants	
• USAID	--	--	(3)	(6.5)	--	--
• Working for TFP (IP, sub-contractors)	(6)	(2.9)	(13)	(28.3)	--	--
• Other value chain actors, consultants	(13)	(7.1)	--	--	--	--
Respondents	210	100	46	100	23	100

DOCUMENT REVIEW

The evaluation team reviewed core program documents relating to the implementation of TFP, assessment reports, studies, surveys, and legal documents (see Annex I). The findings were compiled in a matrix to see whether they can be substantiated by the subsequent empirical research.

ONLINE SURVEY

The evaluation team received a list of 1,483 program participants from TFP. Of these, 988 had an email address and were contacted for an online survey in September 2021 (see Annex VI with the online survey questionnaire). 210 respondents participated, representing a 21 percent response rate. Respondents were requested to score the effects of TFP activities on their own professional capacities and their organization's capacities in trade facilitation. The survey also requested respondents to rate the quality of inter-agency and public-private sector interaction at national and provincial levels and to give recommendations to TFP and USAID/Vietnam on what to prioritize in terms of customs modernization and trade facilitation.

KIIS

The evaluation team conducted 46 virtual KIIs from August to October 2021 with public and private sector stakeholders, the Program Management Unit (PMU) at GDVC, the IP and sub-contractors, and USAID. The sample of key informants is purposive, targeting stakeholders who have been involved in program design, implementation, and supervision at both central and provincial levels. Respondents from these categories then identified relevant private sector actors to add to the sampling. The evaluation team used a KII guide covering all five evaluation questions with probing questions. In addition, more specific questions were formulated for individual KIIs (see Annex VI).

FGDS

The evaluation team conducted three FGDs with a total of 23 participants on the effects of TFP on coordination and private sector engagement. FGD selection criteria targeted central GDVC and local Customs/line Departments, the business community, and research and training stakeholders. GDVC provided support in coordinating the participation of central and provincial officials.

The evaluation team designed separate FGDs to focus on distinct evaluation components: two centered around coordination and one focused on private sector engagement. The FGD on coordination included a stakeholder mapping of the trade facilitation system using the 5Rs and discussion on vertical and horizontal inter-agency coordination and coordination with the private sector. The FGD on private sector engagement used the 5Rs lens to reflect on how the private sector perceives the inter-agency coordination at the vertical and horizontal levels and public-private interaction. The evaluation team used FGD guides to facilitate the sessions (see Annex VI).

Of the five initially planned FGDs, the FGD on the effects of the study tour was replaced with KIIs, and the FGD in one province had to be cancelled because provincial customs mentioned that there had not been many activities yet.

CONSULTATION WORKSHOP

The evaluation team organized a consultation workshop with key stakeholders to discuss and validate key findings and obtain suggestions and recommendations for future programming.

UTILIZATION EVENT

The evaluation team organized a utilization event after sharing the draft evaluation report with USAID/Vietnam and the IP for review to develop a post-evaluation action plan (see Annex X).

CHALLENGES

Due to COVID-19 restrictions, interviews and FGDs were conducted virtually which may have affected the openness of some stakeholders to share their views. There was a challenge to recruit enterprises for KIIs and FGDs which may underleverage the voice of the private sector in the evaluation findings. Some FGDs had overrepresentation of the public sector which may have caused private sector representatives to be less frank. There are some challenges in attributing achievements to the program's support because of the ongoing strong reform efforts by the GVN and inheritance from the USAID predecessor "Governance for Inclusive Growth Program" [GIG]. See Annex VII for more detailed information on evaluation methods and challenges.

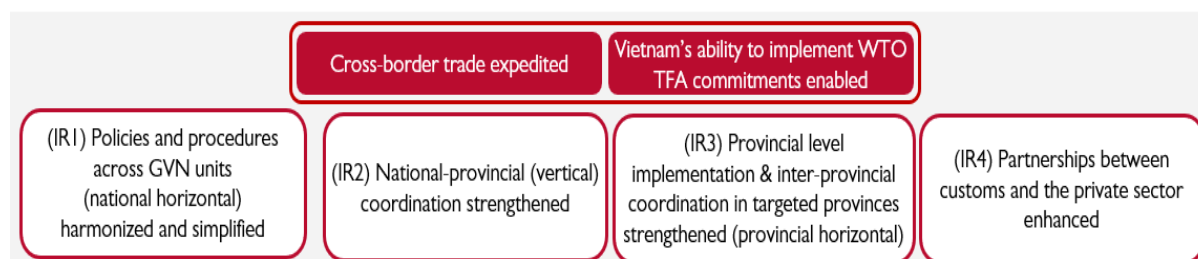
FINDINGS AND CONCLUSIONS

EVALUATION QUESTION I: PROGRESS TOWARD PROGRAM PURPOSE

How well does the activity align with government (central and provincial) and private sector needs to expedite cross-border trade?

Progress toward the program purpose is evaluated against progress towards the two high level outcomes and the IRs of TFP (see Figure I, Annex III).

Figure I: TOC of TFP (Program Logic)



Progress toward high-level outcome: Cross-border trade is expedited

The program is highly relevant to GVN needs to expedite cross-border trade: The program's efforts are fully-aligned to the GVN's continued focus on an open and favorable business and investment enabling environment in terms of simplifying and reducing regulations and compliance costs related to business activities as can be seen in Resolution No. 01/NQ-CP on major tasks and solutions guiding the realization of the socio-economic development plan in 2021. The plan target is to have a rate of simplification and reduction of regulations and compliance costs related to business activities in effective documents by 10-15 percent. The resolution declares (1) to continue supervision of the promulgation of legal documents regarding investment and business conditions, administrative procedures, the regime of specialized reports and inspection, standards, and protocols; (2) to renovate the implementation of the one-stop-shop, single window mechanisms with an orientation towards raising the service quality, overcoming geographical-administrative boundaries, applying IT, saving costs, and ensuring convenience for individuals as well as organizations; and (3) to strengthen coordination to limit and promptly handle overlaps in inspection, examination and auditing activities, not letting them cause difficulties for enterprises' production and sales activities. The resolution directly refers to promulgating or implementing key legal documents¹⁸ to which the program provided support in drafting and/or reviewing.

The program is highly relevant to private sector needs to expedite cross-border trade: The program's efforts are fully-aligned to the private sector's needs for harmonized and simplified regulations and automated/digitized procedures for importing and exporting goods and services, as well as for leveraging their voice to the policy makers. The private sector, particularly SMEs, have limited resources to keep updated about the streamlined regulations and procedures. In the 2020 CSS and in KILs, the private sector confirms the positive improvements in streamlining efforts of regulations, customs administrative procedures and modernization measures which have reduced their compliance

¹⁸ Decree amending and supplementing Government's Decree No. 08/2015/ND-CP dated January 21, 2015 detailing and implementing the Law on Customs regarding customs procedures, customs inspection, and supervision (by September 2021, MOF), Decree on the connection and sharing of information in the fields of export, import, exit, entry, transit of goods, people and means of transport under the national single window mechanism (by December 2021, MOF), Dossiers of the draft Law on Inspection (by May 2021, Government Inspectorate).

costs for customs procedures over the past five years.¹⁹ But compliance costs are still highest for customs procedures for imported and exported goods.²⁰ Approximately 80 percent of enterprises rank import-exporting state authorities simplifying their procedures as a priority (Figure 2). SMEs are not updated about legal regulations and information related to customs procedures, particularly on specialized procedures, because they lack qualified personnel to keep them updated and carry out customs procedures accordingly.²¹

Figure 2: Enterprise Priorities to Expedite Trade



There are two context indicators in the Activity Monitoring, Evaluation, and Learning Plan (AMELP) to monitor the program's progress towards its purpose of expediting cross-border trade in terms of speed with which customs clears goods and the value of traded goods. The program aims to contribute towards improving these context indicators. As context indicators, they reflect the context and it is not within the program's scope to improve them as there are many external factors (e.g., macroeconomic shocks, COVID-19) which TFP cannot influence: The monitoring data provided by TFP show that the number of days to clear customs remain nearly unchanged comparing Fiscal Year (FY) 2020 to the baseline in FY2018.²² The customs clearance time/cost were reduced at different ports/locations in Vietnam, but this does not reflect in the aggregate context indicator. The other context indicator measuring the trade value for imported and exported goods is not yet available for the full FY2021 and therefore no comparison can be drawn to the baseline.²³

Progress toward high-level outcome: Vietnam's ability to implement WTO TFA commitments is enabled

The program is highly relevant to enable the GVN's ability to implement WTO TFA commitments through the program's technical support provided to all three Category A, B, and C commitments of the GVN in the WTO TFA.

The private sector's ability to understand the implications of the WTO TFA is still limited. Only 39 percent of enterprises from the online-survey recognized that the program had a strong effect on enabling them to better understand the WTO TFA implication: Findings from the assessment of WTO TFA implementation progress supported by the program show that Vietnam is on the right track²⁴ to attain full compliance with the WTO TFA and that more technical assistance will be needed for timely implementation.²⁵ Stakeholders confirmed in the online survey and KIIs that TFP activities improved their understanding of WTO TFA commitments. About 78 percent of GVN ministries and agencies recognized strong TFP support in this area, compared to only 39 percent of enterprises. According to the online survey, KIIs and FGDs, enterprises are insufficiently aware of the

¹⁹ 2020 CSS, p51

²⁰ 2020 CAPCI, p36

²¹ 2020 CAPCI, p4

²² Mean number of days for import: 1.61 days (FY2018), 1.74 days (FY2020); Mean number of days for export: 0.19 days (FY2018, FY2020). Source: TFP.

²³ AMELP: Baseline (FY2018): Median import: 0.94 days, median export: 0 days; mean import: 1.61 days; mean export: 0.19 days.

FY2020 (not FY2021): Median import: 1.04 days, median export: 0 days; mean import: 1.74 days; mean export: 0.19 days.

²⁴ According to the WTO TFA database, the current rate of implementation of Vietnam's WTO TFA commitments stands at 26.9%. Source: tfadatabase.org/members/viet-nam

²⁵ 2020 APR, p12

benefits of the WTO TFA. This is partly attributable to their need to address immediate pain points and their low interest and resources to engage more proactively in policy advocacy.

For an overview on the progress towards the four IRs and areas for improvement, see the Results Framework in Annex III. The evaluation of progress towards the IRs touches upon key achievements, for the sake of brevity not all achievements are mentioned. The IRs are the ones used in the approved contract, the AMELP, and the program's progress reports.

Progress toward IRI: Policies and procedures across GVN units (national horizontal) harmonized and simplified

At the national horizontal level, the program has made considerable contributions to harmonized and simplified policies and procedures across GVN units by strengthening the National Single Window (NSW) function of the NTFC and by simplifying import-export procedures with legal support to SI reform, risk management, and customs procedures.

Based on the priorities/needs of the GVN and the private sector, gaps remain. **The function of the NTFC needs further strengthening. The private sector needs more leverage for its voice at the NTFC, and there is a need for further harmonizing of SIs with other line ministries involved in SIs.**

- **The program's support to the NSW has been and remains very relevant as the NSW is at the center of the NTFC agenda.** The program assisted the Information Technology and Customs Statistics (ITCS) Department of GDVC which is hosting the NSW/Association of Southeast Asian Nations (ASEAN) Single Window (ASW) with a draft Decree on information sharing between various agencies and with a blueprint for a more robust ICT system and enterprise architecture. Implementing the Decree on information sharing and the IT blueprint for GDVC are keys for NSW to effectuate the NSW and connect all import-export procedures to the NSW.²⁶ Approximately 70 percent of enterprises in the 2020 CSS prioritize further promotion of IT applications, including the NSW procedures (Figure 3).

Figure 3: Enterprise Priorities Relating to NTFC



- **With support from the program, NTFC made progress in involving the private sector, but there is significant room for improvement.** VCCI is the only private sector representation at the NTFC. There is a need to leverage the voice of the private sector at the NTFC through VCCI and through tailored evidence from the program regarding trade facilitation and private sector engagement. See EQ3 on NTFC's role in the trade facilitation system.

²⁶ In 2018, the NSW processed procedures (including specialized inspection) for 11 GVN ministries and agencies. As of June 2021, it processed 226 administrative procedures of 13 ministries and sectors with approximately 3.89 million dossiers from 47,700 participating businesses. The 2019 NSW Assessment Report recommended that the NSW Portal needs an upgrade of its technical infrastructure with a more stable and faster performance, and that surveyed businesses wanted the application of e-payment and a solution to difficulties while using digital signatures and an improved interconnectivity between the ministries to reduce processing time of the NSW.

- **The program made considerable contributions to SI reform.** Decision No. 38/QĐ-TTg was issued in January 2021, approving the new scheme on reforming quality and food safety (specialized) inspection for imported goods. The Decree on implementing the scheme was drafted by GDVC, with support by the program. Contributions from other line ministries were solicited for an effective implementation upon promulgation. The impact of SIs is one of most significant non-tariff barriers applied to imports and exports.²⁷ **Once the Decree is issued, there will be a need for supporting GDVC and other ministries in its implementation, as well as the private sector in complying with it.** The private sector wants transparent and synchronized procedures across ministries and sectors. The program helped line ministries such as Ministry of Agriculture and Rural Development (MARD), Ministry of Industry and Trade, MOST and Ministry of Transport (MOT) which are members of the NTFC to speed up the implementation of WTO TFA commitments regarding SI.²⁸ Some quality control and conformity assessment areas lie beyond the current draft SI Decree and are subject to amendment of laws under the purview of other line ministries involved in SI. They need assistance by international experts with review and recommendations on harmonizing SI procedures. In the online survey, 54 percent of respondents from the private sector and business associations made suggestions about how the program could support them in SI – for example, through tax- and customs-related trainings on how to avoid risks while being inspected with international good practices.
- **The program supported the first legal act in Vietnam to regulate Risk Management.** The study visit organized by the program identified the need for an Integrated Risk Management mechanism. The MOF Circular No. 81/2019/TT-BC on Risk Management is the first legal act to regulate risk management in Vietnam. The program provided assessments, references, and trainings to GDVC's Risk Management Department (RMD).
- **Customs procedures have been much improved already.** The program supported the revision of Circulars 38/2015 and 39/2018 on customs procedures, inspection, supervision, export and import duties, which are considered among the two most important legal instruments for GDVC and local Customs Departments removing unnecessary burden on business.²⁹

Progress toward IR2: National-provincial (vertical) coordination strengthened

The program laid a foundation for strengthening national-provincial coordination (vertical) through its legal reform and provincial assessment activities. While the evaluation does not see a stronger national-provincial coordination yet, a solid foundation has been laid within 40 months of work and approximately 55 percent of the approved budget ceiling spent. Particularly when taking into account that the past 16 months of the program were affected by COVID-19-related restrictions and the official ODA approval of the project was 14 months after its start, this is a strong achievement. The program has sown seeds with supporting the harmonization and simplification of laws/regulations (see IRI) and the provincial assessments carried out under this IR2, from which stronger coordination will grow. But this takes time, and it needs more emphasis in the remaining 20 months of TFP on working at the provincial compliance in terms of enforcing these laws/regulations and implementing local initiatives based on the provincial assessments. The foundations for a sustainable development of better national-provincial coordination have been strengthened.

- The context indicator in the AMELP and updated monitoring data provided by TFP show that the six targeted provinces have **improved compliance** with central trade policy in terms of clearance time (documents, costs) in 2020 compared to 2018.³⁰ The evaluation team understands that the context indicator showing an improved provincial compliance cannot be

²⁷ 2018 APR, p6

²⁸ The program assisted MARD revising a Circular 15/2018/TT-BNNPTNT on HS codes for goods subject to SI under MARD management. It assisted MOIT to enhance the study and application of trade remedies.

²⁹ 2019 APR, p8

³⁰ 2018 Customs Administrative Procedures Compliance Index. 2020 data provided by TFP.

attributed to TFP alone, because of the strong reform efforts of the GVN, particularly the Customs, and because TFP worked with some of the agencies in the targeted provinces. Evidence from the online survey confirms that 60 percent of respondents confirm that the program had a rather moderate effect on their organization's improved compliance, while 40 percent of respondents say that the program had a strong effect on their organization's improved compliance. See also EQ2 for a more detailed evaluation of the progress on vertical coordination.

- **The study mission³¹ was key to developing buy-in from GVN leaders and speeding up SI reform whereas SI reform is crucial to strengthening national-provincial coordination.** The draft Decree on SI will lead to an improved compliance of the provincial level agencies with the national level policy when implemented (see Progress toward IRI).
- **The program assisted GDVC with key assessments, reports, and internal reviews which laid the foundation for future work at provincial levels in risk management and e-commerce that will help reduce time, costs, and procedures for clearance of goods.** The provincial situational assessment reports on trade facilitation conducted by the program helped to **identify provincial priorities/needs for the GVN and the private sector³²** and formed the basis for the workplan for provincial activities. A report on the future model and systems for risk management helped GDVC to identify priorities for risk management in Vietnam Customs.³³ Based on this, the RMD of GDVC developed activity plans for capacity strengthening in risk management, implementing the Circular on Risk Management (see Progress toward IRI). There remains a continued need for **capacity strengthening for GVN agencies and the private sector in SI and risk management** at central and provincial levels to increase compliance. The program supported the Customs Control and Supervision Department (CCS) of GDVC to develop a Scheme for Management of cross-border e-commerce with private sector consultations (Decision 431/QD-TTg issued in March 2021). It has not yet been approved. It is anticipated that the Decree will enhance transparency in the Customs legal framework and also reduce time, cost, and procedures for customs clearance of goods trade via e-commerce.³⁴
- **The program's support to MOIT provided for further requests for TF related assistance that helps MOIT comply with its WTO TFA commitments** Decision No. 824/QD-TTg was issued in July 2019 to address concerns over original fraud and illegal transshipment. The program assisted MOIT with a workshop on implementing the Decision, which - if it is implemented - can strengthen national-provincial coordination between MOIT and its provincial departments.

Progress toward IR3: Provincial level implementation and inter-provincial coordination in targeted provinces strengthened (provincial horizontal)

The program's AMELP has training and capacity building related indicators to measure progress towards strengthened provincial horizontal coordination. Based on the data, **the program has**

³¹ 2019 APR, p22: The Program organized a field study about the performance of regulatory and procedural implementation and enforcement of customs agencies in different border gates, cross-border trade transactions and industries. The study tour focused attention on the NTFC, NSW, e-commerce including express or expedited shipments, risk management and targeting and the customs control measures and enforcement at a port and airport.

³² Provincial priorities/needs of the GVN: (1) Specialized Inspection, (2) Risk Management, (3) Prevention of Origin Fraud and Illegal Transshipment, (4) Coordinated Border Management, (5) Implementation of the National Single Window, (6) Customs-Business Partnership, (7) Training and Capacity Building. Private sector priorities/needs: (1) Specialized Inspection, (2) NSW, (3) Customs Procedures, (4) Customs-Business Partnership.

³³ 2020 APR, p 16, 17: The priorities were: (1) Need to create a National (centralized) Inter-Agency Risk Analysis Targeting Center where agencies are collocated for a more integrated border management approach which led to buy in from GDVC and the program will assist in developing this Targeting Center starting from year 3. (2) Improving the effectiveness of declaration processing channel selectivity linked to implementation of key performance indicators (KPIs) throughout the administration. (3) Encouraging and further developing voluntary compliance. (4) Management and operations of Non-Intrusive Inspection (NII) equipment (scanners) and integration of risk management principles and NII scanning.

³⁴ 2021 Q3PR, p8

strengthened provincial level implementation in the targeted provinces by improving capacities in trade facilitation, SIs and risk management. See also EQ2 for a more detailed evaluation of the progress on provincial horizontal coordination.

- **The program has helped improving capacities in SIs and risk management, anti-corruption, gender-equality³⁵ and other training topics related to trade facilitation for GVN actor and the private sector.** The program exceeded the number of person hours of training³⁶ in trade and investment, despite some COVID-19 related delays. Only one of the program's capacity related indicators is an outcome indicator "Percent of United States Government (USG)-assisted organization with improved performance." There is evidence from the program's individual pre- and post-event assessments that trainings had a high overall quality and improved capacities. The evaluation finds that the improvement of capacities was rated more moderately by more than 50 percent of the online-survey respondents.³⁷ From the KIs, it is understood that delays at the program's start and virtual delivery due to COVID-19 restrictions affected the participants' scores. Due to COVID, most trainings could be organized and reported in Q1FY21. Given the importance of capacity building in the program's TOC to strengthen provincial horizontal and national-provincial coordination, the future program's progress reports should sufficiently synthesize the evidence from its individual pre-/post-event assessments, including the reporting on the CBLD-9 indicator "Percent of USG-assisted organizations with improved performance." In the remaining twenty months of the program, the GVN and the private sector identified that there is a **need for more capacity strengthening in SI and risk management.**
- **The program built the capacities of the Vietnam Customs School (VCS) to improve their performance in e-learning which was timely for COVID-19 related restrictions to have in-person trainings.** While TFP waited for official ODA approval, the program assisted VCS to use and customize the World Customs Organization's (WCO) training and e-learning software (CLIKC!) to train customs officials.³⁸ The support under CLIKC! enabled VCS to understand and manage the e-LMS's functionalities.³⁹ VCS was also supported in the development of an e-Learning Management System (eLMS). Key informants stated that the eLMS was not yet functional enough because of a poor interface and limited access for up to 200 people at a time, but TFP reported that the problem was later fixed. The program equipped VCS full-time and visiting trainers in train-the-trainer workshops on e-learning course development. While the program supported the computers, software and learning modules, the sustainability of the support to VCS is unclear as it has little own training personnel, and VCS may be merged under the MOF's School of Finance and Accounting.
- **The program built the capacities of GDVC's CCS and RMD, and the MOF. The CCS Department** was assisted to improve its performance through the program providing expertise and hosting working groups on initiating the SI scheme. **TFP strengthened capacities of RMD and MOF in integrated risk management approaches.**⁴⁰ The program assisted GDVC's RMD to draft and issue Circular 81/2019/TT-BTC, dated January

³⁵ For a more detailed evaluation of the program's gender responsiveness see EQ 4.

³⁶ More than 8,688 person hours of trainings/consultative workshops were provided. (2021 Q3PR)

³⁷ The evaluation team received a participants list with 1,484 program participants who were also contacted as part of the online survey: The online survey confirms that the program activities had a strong effect for 43 percent of respondents on strengthening their professional capacities in trade facilitation. 53 percent gave it a moderate score. 42 percent scored the program's effect on their capacities to implement modern customs and risk management approaches as strong and 50 percent scored it as moderate. 27 percent rated that the program had a strong effect on their improved management of SI of imports and exports. 56 percent rated the effect as moderate. 40 percent scored that the program's effect on their capacities for a better interpersonal communication was strong and 47 percent scored that it was moderate. Public and private sector stakeholders varied in their scores.

³⁸ Prior to the program hosting CLIKC! training courses, WCO had granted two certificates of achievement to Vietnamese customs officials. With the program's support, 489 certificates were awarded, and 286 participants from GDVC and local customs attended the train-the-trainer program.

³⁹ 2019 APR, p4, 23-24; 2020 APR, p3, 18, 27

⁴⁰ 2020 APR, p19

2020 on Risk Management (see Progress toward IRI) and developed a capacity development plan for customs officials at the central and local levels that needs further implementation in the remaining 20 months of the program. Respondents from the post-course evaluation expressed their concerns on actual compliance with the new regulations as it will take time and require more support and guidance in implementation. Respondents noted that they will need more responsive support services/contacts—online and offline—for emerging issues while implementing the circular. **There is also a need for detailed guidance for enterprises** through websites or more trainings of risk management and a FAQ section. TFP supported the **MOF** to develop the SI Scheme and draft a Decree for its implementation (see Progress toward IRI). For sustainability, the program aims to focus any risk management training on SI and will contain elements of train-the-trainer skills.⁴¹ TFP recognizes that there remain challenges in the counterpart's willingness to have international experts delivering training courses virtually. **The Personnel Department of GDVC highlighted their need for support in preparing a strategic plan for further development of human resources in customs** (GDVC and local Customs Departments). The program supported a training needs assessment for a Leadership and Management Development (LMD) skills training for senior customs officials that will be delivered by a Vietnam-based higher education institution based on the training needs assessment and the GDVC Decision 223/QD-TCHQ dated 2019.

- **The program supported a pilot for public-private sector interaction that can trigger future private sector investment.** The pre-feasibility study supported by the program addressed the de-congestion at Cat Lai terminal which may become a pilot for replication in other port operations.⁴² It is anticipated that the scheme would greatly reduce time and cost to trade and bolster trade.⁴³ The pre-feasibility study attracted support for technical studies under USAID INVEST which can trigger future private sector investment. **There is a need for more progress in enhancing public-private sector interaction at provincial level (see EQ2)**

Progress toward IR4: Partnerships between customs and the private sector enhanced

The program enhanced partnerships between customs and the private sector and leveraged private sector knowledge. In the remaining twenty months of the program, the GVN and the private sector identified that **partnerships between customs and the private sector need to be further enhanced and private sector self-compliance with import-and export procedures be promoted. Business associations need more capacities to engage in policy advocacy.**

- The context indicator from the AMELP shows that in 2020 more businesses are satisfied/rather satisfied with obtaining information from GDVC and local customs compared to the baseline in 2018.⁴⁴
- **The program has been successful in leveraging private sector knowledge and creating shared value** ⁴⁵ **through key surveys/assessments.** While private sector needs for expediting cross-border trade are more and more addressed during the last years, the 2020 CSS indicates that there is still a lot of room for improvement. The Customs Administrative Procedures Compliance Assessment kicked off in 2019 was the first ever survey of this kind. The assessment on the usability of the NSW and the Vietnam Trade Information Portal (VTIP)⁴⁶ provided evidence on how to better address requirements of the

⁴¹ 2020 APR, p17

⁴² 2021 Q2PR, p1

⁴³ 2020 APR, p2, 20

⁴⁴ 2020 CSS, p47

⁴⁵ 2019 TFP PSE, p4

⁴⁶ 2020 CSS, 2019 CAPCI, 2020 Assessment Report on business satisfaction and time needed to carry out administrative procedures through the NSW; 2020 Assessment Report of the VTIP

private sector. There is a need to better utilize this evidence to raise the awareness of NTFC members with evidence-based recommendations.

- **The program has utilized the Customs-to-Business (C2B) consultation mechanism at the central level but has not done so sufficiently at the provincial level. The COVID-19 travel restrictions affected this result.** Customs did reforms fast and comprehensively, improved outreach in the past five years through C2B consultations and an accountable reform agenda. Customs authorities rank highest in enterprise satisfaction (66 percent) in the 2020 CSS compared to other stakeholders (e.g., SI agencies, 56 percent enterprise satisfaction). At the central level, the program worked well with VCCI, Vietnam Business Forum (VBF) and the private sector, especially with representatives from FDI companies. It took advantage of the existing networks at national level, but not sufficiently of the existing networks at the grassroots level (at provincial, border-gate, inter-provincial levels or social networking groups) to spread its outreach and training activities. It could have reached a wider private sector audience if it had used them better. Partnerships of trust and regular C2B consultations are seen as a basis for an increased voluntary compliance by businesses with cross-border trade related rules and regulations. There is a need to draw lessons from good practices of private sector self-compliance with customs and other import-export related procedures and share them through the existing C2B channel.
- **Provincial trade facilitation committees (PTFCs) have been established in three provinces and provincial trade facilitation needs to be further promoted from bottom up.** Based on the feasibility study on PTFCs supported by the program, three provinces have set up trade facilitation mechanisms:⁴⁷ Dong Nai province, Quang Tri province, and Da Nang province.
 - The People's Committee of Dong Nai issued Decision 175/QD-BCDPTKT in November 2021 on setting up the Sub-committee of Technical Support for Trade Facilitation under the Steering Committee for Economic Development of Dong Nai Province. It will assist the existing "Dong Nai Steering Committee on Economic Development," and will be headed by a representative of DOIT and a representative of Dong Nai Customs as a deputy head.
 - In Quang Tri province, a "Steering Committee on Trade Facilitation" was planned to be set up in November 2020 which will be chaired by the Vice Chairman of the People's Committee assisted by the local Department of Industry and Trade (DOIT). By the time of the midterm evaluation, there was no meeting yet of the local TFC.
 - Da Nang province established a "Trade Facilitation Steering Committee of Da Nang City" in May 2021.
- There is a need for further promoting provincial trade facilitation with bottom-up initiatives (see EQ3 for a more detailed evaluation).
- **Private sector led trade facilitation meetings have been initiated at the national level in collaboration with VBF and are planned to be escalated to the provincial levels. The private sector is more open to the program now.** The meetings started in 2020, with representatives from domestic and international companies, big advisory companies, and law firms. The collaboration has led to an upcoming Memorandum of Understanding (MOU) between the program and VBF which will increase the program's support to leverage the voice of the private sector as the VBF is an umbrella forum for important chambers and associations with high-level executives. Although COVID-19 interrupted the momentum, key informants mentioned that in the last six months, the private sector is opening more to work with the program. Now GDVC is also interested to join these meetings.

⁴⁷ Q3PR, p ii. Most recently a fourth PTFC was established in Hai Phong, but the evaluation was concluded by that time.

In the private sector, particularly SMEs are constrained to make their voices heard in policy development. While business associations should represent SMEs' interests in policy development, they lack the capacities for it.

Conclusion for EQ 1

The program is well-aligned with government and private sector needs to expedite cross-border trade and Vietnam's ability to implement WTO TFA commitments.

Achievements under the individual four components contributed to progress toward the program's purpose: There is evidence that (1) the program made considerable contributions to harmonized and simplified policies and procedures across GVN units in SI reform, risk management and customs procedures. (2) The program has laid a good foundation for strengthening national-provincial coordination, through its legal reform and provincial assessment activities. (3) The program strengthened provincial level implementation in targeted provinces, and capacities in SIs and risk management are improved, although with more moderate effect. TFP successfully conducted a pilot for public-private sector interaction that can trigger future private sector engagement. (4) The program enhanced partnerships between customs and the private sector and leveraged private sector knowledge. At the provincial level, local authorities prioritize investment promotion which affected buy-in into TFP's provincial trade facilitation work.

Based on the priorities/needs of the GVN and the private sector, the following gaps remain: (1) The function of the NTFC needs further strengthening. The private sector needs more leverage for its voice at the NTFC. There is a need for further harmonizing of SIs with other line ministries involved in SIs. (2) There needs to be more implementation of the procedures harmonized with the program's support for a better provincial compliance. This is connected to a need for more capacity strengthening for GVN agencies and the private sector in SI and risk management at central and provincial levels. (3) There is a need for more progress in enhancing public-private sector interaction at provincial level. (4) Partnerships between customs and the private sector need to be further enhanced. Business associations need more capacities to engage in policy advocacy. Provincial trade facilitation needs to be further promoted.

The private sector, particularly SMEs, is constrained to make its voices heard in policy development. While business associations should represent their interests in policy development, they lack the capacities for it. Within the scope of the program, this can be addressed by strengthening capacities of business associations in policy advocacy and by assisting GVN agencies to communicate implications of trade related reforms in an understandable manner to businesses, especially SMEs. Beyond the scope of the program, the role of USAID could be to push for the inclusion of the private sector in the NTFC.

EVALUATION QUESTION 2: PROGRESS TOWARD IR 2 AND IR 3

To what extent has the activity helped to improve inter-agency coordination at central and provincial levels and central-provincial coordination to expedite trade? What are the obstacles and opportunities for improvement, especially from the GVN point of view?

The program invested in understanding the mechanism and status of inter-agency coordination on trade facilitation at central level. Most research commissioned by the program pointed out that there are many steering committees. at central level, and three of them provide support for trade facilitation activities:

- The Government's Steering Committee on Administrative Reform⁴⁸

⁴⁸ Established under the Decision No. 200/1998/QĐ-TTg dated 10/14/1998; updated by Decision No 1161/QĐ-TTg dated 7/13/2021.

- The National Steering Committee Against Smuggling, Trade Fraud and Counterfeit⁴⁹
- The National Steering Committee on the NSW and ASEAN Single Window and Trade Facilitation⁵⁰

The program supported the NTFC by commissioning a report that recommended reforms to NTFC including increasing the role of the private sector, revising financing sources for the NTFC, establishing PTFs, and establishing working groups or subcommittees. These recommendations are valid for the NTFC's operation in the long run, but they are not effective to achieve a prompt improvement in coordination among line ministries. While trade facilitation is agreed to by the GVN, its commitment to support trade facilitation is insufficient. The NTFC's agenda has been rather filled with other tasks (e.g., the NSW) than trade facilitation. Based on NTFC's current output and impact, NTFC is not functioning according to its expected mandate. The support by the program to the NSW is highly valued, however, as the NSW is an integration hub for all trade procedures.

TFP and GDVC have been strategic in building confidence and trust among TF agencies and the two key policy actors i.e., Office of the Government (OOG) and Ministry of Justice (MOJ). These two actors play key roles in any substantial action including policy coordination and legal promulgation. The SI Decree which is expected to be enacted in early 2022 is a concrete result of such an investment. The positive and mutual understanding built up with the OOG and MOJ was inherited from previous USAID programs, and TFP continued this momentum forward.

The program's support to line ministries has been recognized by some line ministries, including MOIT and MARD. The program assists MOIT to support the implementation of Decision No. 824/QĐ-TTg to address concerns over original fraud and illegal transshipment. Some initial discussion among TFP and MOIT to introduce a sector-based voluntary exporter registration scheme for trade primarily with the US has been in place. TFP also supported MOIT by investigating options for establishing a national mutual recognition arrangement (MRA) to integrate MOIT in the already established the Authorized Economic Operator program. TFP also supported MARD in carrying out private sector consultations for trade facilitation relevant legal promulgation. Our KIs with MARD officials revealed that they could not reach such a wide audience and coverage of consultation without TFP support. **The program's support laid the foundation for a future trade facilitation agenda among MOF, MOIT and MARD which are the key ministries at central level.** Support to other line ministries has been limited.

As pointed out in TFP commissioned report on the NTFC, improving coordination at central level is more complicated and may require continued effort beyond TFP. So far, TFP has adopted the "NTFC+" approach by signing an MOU with the VBF, extending the collaboration with VCCI and Board IV⁵¹ under OOG.

While vertical linkages within the Customs system are fast and effective, the linkages with other agencies at provincial level are found weak, and there is room for improvement (see also Annex V). The KIs show only minor interest and involvement of provincial line departments except for Ho Chi Minh City. The online survey shows a wide satisfaction gap among different stakeholder groups on the quality of interaction among the organizations (see Figure 4). While 60 percent of central GVN ministries/agencies show satisfaction with their own interaction, only 34 percent of enterprises group are satisfied with how agencies interact at central level. About

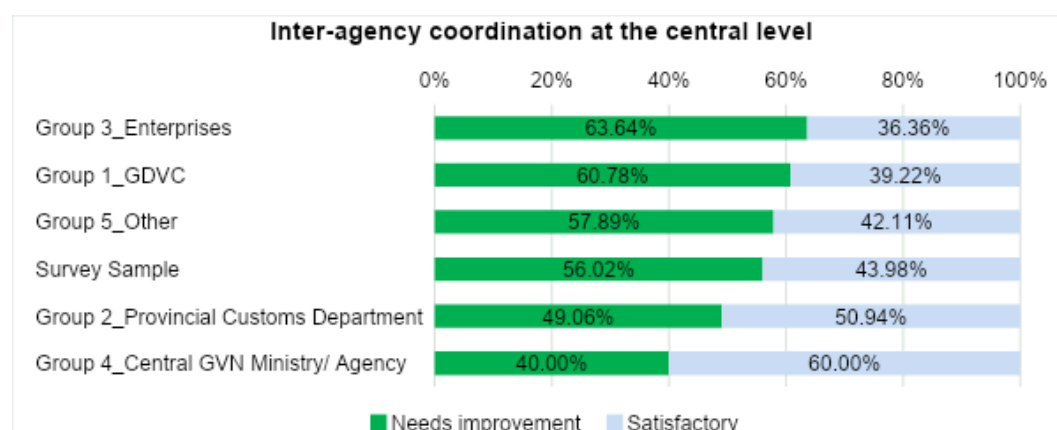
⁴⁹ Established under the Decision No.389/QĐ-TTg dated 3/19/2014; updated by Decision No.09/QĐ-TTg dated 1/6/2017 (389 Committee).

⁵⁰ Established under the Decision No.1899/QĐ-TTg dated 10/04/2016; updated by Decision No.684/QĐ-TTg dated 6/4/2019 (1899 Committee/NTFC).

⁵¹ Board IV is the Private Economic Development Research Board of the Advisory Council for Administrative Procedure Reform of the Prime Minister.

64 percent of enterprises and 61 percent of GDVC, on the contrary, say that much improvement is needed. The issue remains critical as the SI Decree is yet to be enacted. The debate and struggle among line agencies and MoF/GDVC renders an effective implementation dependent on better coordination at the central level. Quantitative analysis and qualitative data confirm that dialogue among line ministries should be improved at all levels to make sure that the business community benefits from the new Decree.

Figure 4: Quality of Inter-Agency Coordination in Trade Facilitation at Central Level



Source: TFP midterm evaluation online survey

At the provincial level, the program also carried out a feasibility study on the establishment of PTFCs to shape the program's activities in the six targeted provinces. Though analysis and stocktaking were made, TFP took a safe strategy by adopting the NTFC model to the targeted provinces. **Local provinces were hesitant to adopt the NTFC model as there are already various “steering committees” in each province such as Trade and Investment Promotion Agencies and Provincial Competitiveness Index steering committees.** GDVC did not support such a decentralized initiative for the first two years of the program. By the time of the midterm evaluation, stakeholders from central and provincial levels are still in doubt about the implementation of PTFCs.

Program activities that focused on supporting Customs Departments in the six provinces hosted by GDVC were well-organized and received, because of the **strong vertical linkage among GDVC and the provincial Customs Departments.** The bottom-up approach to local trade facilitation initiatives was not as smooth as the top-down one: Some proposals submitted by local Customs have been suspended by the program for different reasons of feasibility and technical resources. For example, one local Customs Department requested technical support/training in recognizing and preventing commercial fraud in e-documents. And GDVC and the PMU could not respond to that due to lack of experts and it may require the Ministry of Public Security's coordination. The program decided only to implement local initiatives in line with its central capacity building strategy.

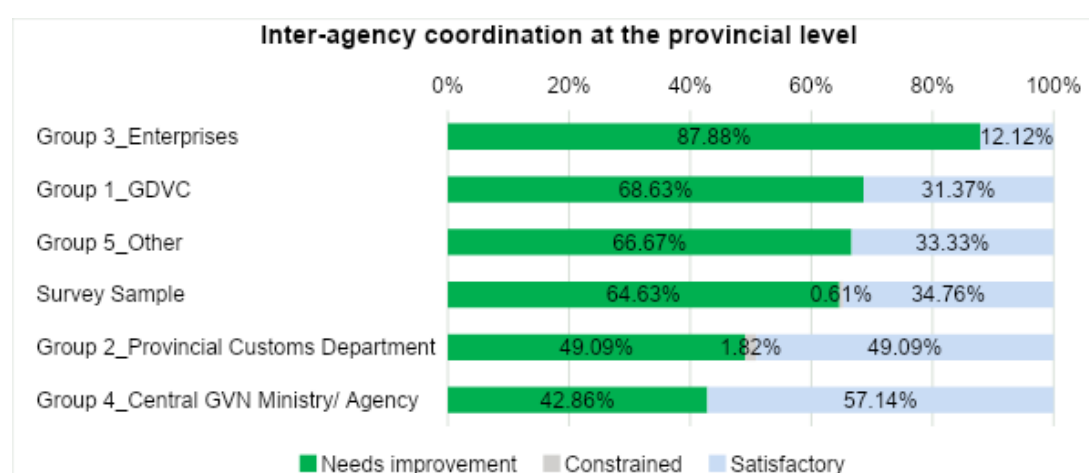
Program activities that focused on other line departments faced challenges because GDVC is not in a position to request Provincial People's Committees (PPCs) to set up a local trade facilitation mechanism. The program expected NTFC's direction to the PPCs but such linkage was missing (see also Annex V). The dilemma is while the establishment of a PTFC is out of GDVC's control, the operation and local initiatives proposed under TFP shall be subject to GDVC approval.

There is little incentive and motivation of local stakeholders to push for local participation in trade facilitation initiatives. The KIs confirm that PTFCs were established in Quang Tri, Da Nang, and Dong Nai with the program's consultation, but they do not have activities, yet, so it is premature to assess their effectiveness. As TFP got GDVC's support for decentralized initiatives during its third year and given the COVID-19 restrictions, most local activities are not yet

in place, and local stakeholders are uncertain about the possibility to get approval. PTFCs which were modeled after NTFC in these provinces also have limited room for private sector representation. By the time the evaluation was concluded, the program could not establish PTFCs as planned in Hanoi, Hai Phong, and HCMC as these cities were hesitant to adopt that model. KILs confirm that some provinces do not consider trade facilitation high priority. Inducing and attracting as much investment as practical during a five-year term remain the top priorities of most PPCs and Party for promoting economic growth. Provinces with existing mechanisms with a trade facilitation agenda perceived the establishment of a new mechanism as unnecessary.

Respondent views on the **quality of inter-agency coordination at the provincial level demonstrate a need for improvement**: 88 percent of enterprises and 69 percent of GDVC staff demand for an improvement (see Figure 5). As a result, **there is not yet clear evidence of the effect of the program's activities on improving provincial coordination regarding trade facilitation**.

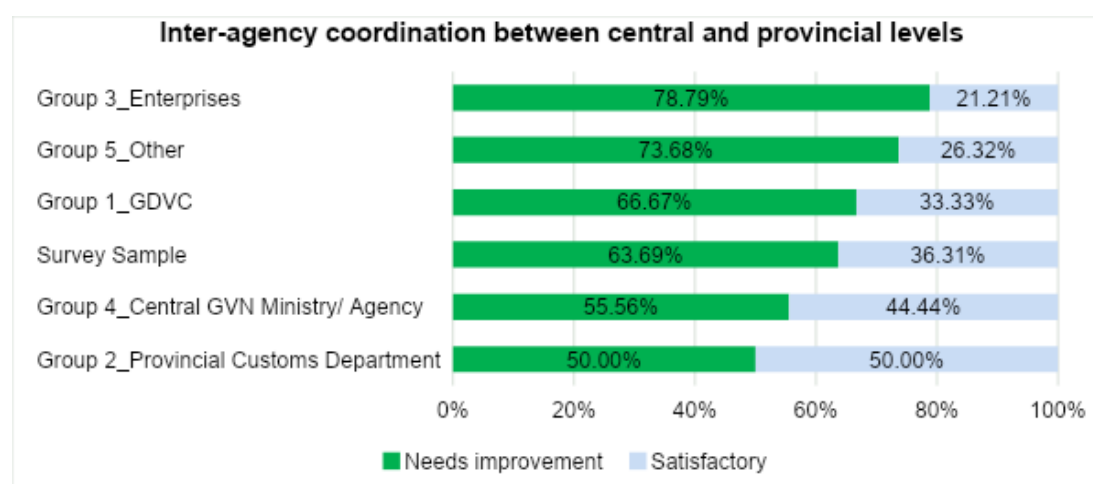
Figure 5: Quality of Inter-Agency Coordination in Trade Facilitation at Provincial Level



Source: TFP midterm evaluation online survey

Though the program implemented meetings and consultations in the six provinces, local stakeholders were not informed well enough about the program and approval/selection criteria for local initiatives. Some initiatives have not been accepted by GDVC or the program. **There is room for improving inter-agency coordination between central and provincial levels**: 79 percent of enterprise and 67 percent of GDVC, who are the two main actors in trade facilitation, require a strict improvement of such vertical linkage (see Figure 6).

Figure 6: Quality of Inter-Agency Coordination in Trade Facilitation between Central and Provincial Levels



Source: TFP midterm evaluation online survey

Program implementation is challenged when priorities of GDVC, other central agencies and local initiatives head towards different directions: KIs show that there is a discrepancy among local stakeholders' understanding of TFP's objectives and operation. **Though trust and relationship has been built between TFP and GDVC, time and technical support are needed for other stakeholders** to help to navigate any conflicting issues.

Finally, engaging the private sector more in trade facilitation is a requirement at both central and provincial levels. The online survey shows a high demand of 90 percent of enterprises for improving public-private sector interaction at provincial level (see Figure 7). The participation of provincial business associations provides incentives and opportunities for all line departments at provincial level to implement national policy/reform and to coordinate with the PPCs.

Figure 7: Quality of Public-private Sector Interaction in Trade Facilitation at Provincial Level



Source: TFP midterm evaluation online survey

Vietnam Customs developed C2B consultations, engaging enterprises at all levels, from national to sub-provincial level in various forms. In their daily routine, Customs staff and enterprises could consult effectively through meetings, working groups, consultation workshop, social network group and/or technical support network operated by some customs unit or brokers. **Such level of interaction among enterprises and Customs has great impact and laid the foundation for any outreach activities regarding C2B collaboration.** In the 2020 CSS, customs authorities rank highest in enterprise satisfaction (66 percent) compared to other stakeholders (e.g., SI agencies, 56 percent). While we find evidence of TFP activities which were built upon the foundation of the existing C2B consultations at national level given TAF's and VCCI's participation, the program did not take

sufficient advantage of them and could have reached a wider private sector audience if it had used them at provincial level.

Conclusion for EQ 2

One of the key objectives of WTO TFA and TFP is to facilitate trade in goods and services by promoting coordination between customs with other competent authorities and compliance. The program provided substantial support to the customs system and some technical support to line ministries. Given the support to the NTFC (NTFC) and the practical support to establishing PTFCs, it can be concluded that the program has laid the foundation for inter-agency coordination and harvested some initial results. Fragmented government actions from national to provincial levels regarding trade facilitation and other governance arrays remain challenges to the program's expected outcome and progress. Working with NTFC (1899 Committee) as the main avenue for trade facilitation coordination is the "right" strategy but not comprehensive enough to introduce change and the required improvement of coordination. Given the limited resources at national and provincial levels for coordinating trade facilitation, the provincial level needs to be included in program' remaining life through locally embedded trade facilitation initiatives.

At the provincial level, the program works in six target provinces: Ha Noi, Hai Phong, Quang Tri, Da Nang, Dong Nai, and Ho Chi Minh City. The official approval for TFP was granted in July 2019, and the COVID-19 outbreak shortly afterward prevented the program from doing preparatory assessments for activities with stakeholders at the provincial level. This appears to have contributed to challenges in getting buy-in from provincial stakeholders. Progress in improving national-provincial coordination cannot be clearly observed. PTFCs were established in three provinces and the debate remains whether the program should try to adopt the model in all six targeted provinces. We conclude that the program should employ a flexible approach for the remaining 20 months toward the program objectives.

Key findings and conclusions highlight the urgency and importance of continuing dialogue at central level with line Ministries to pave a platform for the implementation of the new SI Decree. Engaging with the private sector is an objective and also an instrument to integrate state agencies vertically and horizontally, given their accountability towards businesses. Investment in stakeholder coordination should remain one of the key deliverables of TFP.

EVALUATION QUESTION 3: DRIVERS OF PROGRESS

What are the driving factors influencing or inhibiting progress to date, particularly in customs and trade facilitation systems?

Factors that play the largest role in the progress (or lack of progress) in customs and trade facilitation systems:

The trade facilitation system is complex. It covers activities of different stakeholders that impact and/or are involved in cross-border trade, ranging from the OOG, enforcement agencies at borders, other ministries/agencies with policy influence, to private sector and business associations. Trade facilitation includes various requirements for technical assistance and capacity building at national and provincial levels. Annex IV includes a stakeholder matrix, and Annex V includes a simplified stakeholder map of the trade facilitation system to show key actors and the strength of their linkages.



RESULTS

Trade facilitation plays a crucial role in Vietnam's Socio-Economic Development Strategy 2011–2020, which aimed at improving the country's business environment with the objective of sustaining trade growth and doubling GDP per capita.⁵² Trade facilitation performance improved remarkably from 2017 to 2019 in many areas,⁵³ including simplification of customs procedures. GVN and its line ministries and agencies make the best endeavor to lift the trade barriers, enabling import and export flows faster, cheaper, and more predictable.

The program has provided technical assistance, training, and other support to Vietnamese counterparts on technical inspection and risk management to facilitate cross-border trade and enable Vietnam's ability to implement WTO TFA commitments. Regarding efforts to reduce and simplify regulations related to SI for import and export goods under the management of ministries, the MOF/GDVC have actively reviewed legal regulations related to SI management, coordinated with relevant ministries and agencies to implement the instructions related to the reform of SI, and proposed to reduce the list of goods subject to as well as abolish the procedures of SI before customs clearance. GVN efforts to improve the NSW and SI scheme were significant reform activities and a key focus during the past few years. As of September 20, 2021, the NSW system has integrated 235 administrative procedures of 13 ministries/agencies with the total number of 4.1 million entries of nearly 49.5 thousand enterprises.⁵⁴

COVID-19 has caused many restrictions to TFP activities, but the program has been able to invite international experts to conduct virtual activities on capacity enhancement. The program wisely chose to focus on digitization and soft skills for professionals, as confirmed by KIIs. Due to COVID-19, there is more demand for a digital and automated system for cross-border transactions, transformation of traditional to electronic learning, and virtual networking.



ROLES

Role of GDVC: The GVN formulated a schedule to implement trade facilitation measures, which are classified into categories A, B, and C in line with the WTO TFA provisions. As a government agency concerned with border management, GDVC is involved in the majority of those category A, B, C designations.⁵⁵ GDVC is a key driver of transformation in line with international commitments. Meanwhile, TFP brings in the opportunity of technical assistance to organizational and procedural reform. TFP is coming at the right time and as the right partner when GDVC would like to transform into a better state agency with better service to the public and private sector community. The MOF—which oversees TFP—assigned GDVC to run the PMU, because GDVC was already a partner under the predecessor program GIG and is the focal point for public-private representation. **GDVC is a key player in the customs modernization and trade facilitation.** As such, the partnership with GDVC has enabled TFP to achieve certain progress. Yet, its limited mandate in directly coordinating with ministries and their departments at national and provincial levels also inhibits the program's achievement in improving national and provincial coordination.

⁵² Ha, D.T.T. and L.Q. Lan (2021), 'Viet Nam Report', in ERIA (eds.), Towards Seamless Trade Facilitation in ASEAN: Results from the ASTFI Baseline Study. ERIA Research Project Report FY2021 No. 08, Jakarta: ERIA, pp.142-154.

⁵³ OECD, Compare Your Country Trade Facilitation Indicators. Available at compareyourcountry.org/trade-facilitation (accessed November 11, 2021).

⁵⁴ Article: "Active implementation of the National Single Window and the ASEAN Single Window, specialized inspection and trade facilitation," available at <https://www.customs.gov.vn/> and <https://nangluccanhtranh.chinhphu.vn/> (accessed October 04, 2021)

⁵⁵ WTO. Trade Facilitation Agreement Database, Status of Vietnam's Commitments and Implementation. Available at tfadatabase.org. (accessed August 30, 2021).

Role of NTFC: Following Decision No. 1899/QĐ-TTg,⁵⁶ the MOF, represented by the GDVC, was assigned as the coordinator for the implementation of the trade facilitation plans. NTFC's working office—which is acting as the Committee's Secretariat—is housed in GDVC's ITCS Department. It is mostly known for its work under the NTFC for hosting the single window system. The NTFC is unable to adequately perform its functions for the reasons below:

- The current working office of NTFC is already overloaded with the NSW/ASW mandate.
- While NTFC's members are key ministries, its standing agency (i.e., GDVC/ITCS Department) is at a level lower than a ministry, making it difficult to coordinate NTFC's activities and tasks.
- The NTFC operates at national level only and has no sub-committee or working groups.
- The participation of the private sector and industries to the NTFC agenda and to monitor its implementation is limited. There is little voice of the private sector on the NTFC, only via the VCCI. The Vietnam Logistics Business Association (VLA) has been merely invited to attend a few meetings of the NTFC.

Given the above, NTFC has an important role in trade facilitation, but its ineffective function has limited and will continue to be a challenge for TFP to approach NTFC leadership and to promote vertical and horizontal coordination effectively.

Roles of PPC and PTFC: At the provincial level, the adequate entry point for the program would have been through the PPCs who have already established trade-related committees and to seek their commitment and buy-in. PPCs have vital influence toward trade facilitation efforts in provinces because they monitor and facilitate trade-related policy execution, help connect the private sector in their localities, and advocate business concerns to the central government. Finding a good approach with PPCs could enable more effective promotion of local trade facilitation, including customs and SI reform.

The provincial trade facilitation sub-committees established in three provinces (Quang Tri, Da Nang, and Dong Nai) mirror what NTFC is at the central level, with too little private sector representation. KIs confirm that the provincial trade facilitation mechanism, whether an established PTFC or not, could be better incentivized as public-private interaction in trade facilitation efforts.

Role of private sector: The private sector is only represented at the NTFC through VCCI and no other associations. The private sector and associations confirmed in interviews that they only have their voice heard when there are immediate pain points to solve. The ability of enterprises to implement laws remains weak: SMEs have limited capacity and resources and rarely invest in facilities or personnel for carrying out compliance procedures. Consequently, the costs for learning about procedures and complying with relevant regulations were high. The inaccurate preparation of dossiers resulted in high costs for the clearance step.⁵⁷ In the first couple of years, the program worked more with GDVC and built their capacities. **Now there is a need to focus more on the private sector.**



RELATIONSHIPS

Trust is an important aspect of relationships in the trade facilitation system. It took approximately two years for the IP and GDVC to build a trusted relationship which now lays a good foundation for the program to move forward in the remaining two years. It

⁵⁶ Decision No. 1899/QĐ-TTg dated 4 October 2016 and its amendment Decision No. 684/QĐ-TTg dated 4 June 2019: The National Steering Committee on the ASEAN Single Window, the National Single Window, and Trade Facilitation, which was established, functioning as the National Trade Facilitation Committee of Viet Nam (NTFC) in accordance with the WTO TFA. The NTFC is chaired by a Deputy Prime Minister and consists of 19 members from the Office of Government, Vietnam Chamber of Commerce and Industry representing the private sector, and line ministries and agencies. It meets twice a year and has three main mandates, including (i) implementation of NSW/ASW and reform of specialized inspection, (ii) trade facilitation, and (iii) logistics development (newly added in 2019 and in charge by the Ministry of Trade and Industry).

⁵⁷ USAID TFP. May 2020. An Assessment of Compliance costs of administrative procedures in Customs (APCI 2020), p.60.

also takes time to build trusted collaboration between customs and the private sector. Without it, initiatives such as voluntary compliance are difficult to achieve. Trust building between the private sector and customs and other state agencies deserves more emphasis moving forward.

Another inhibiting factor to TFP's progress originated from GDVC's limited mandate in coordinating with ministries and their departments at national and provincial levels. As a result, it affects the extent to which the program could support the revision of policies and procedures and the extent to which provincial initiatives outside the customs system can be addressed.

For trade facilitation mechanisms to work effectively at central and provincial inter-agency levels (horizontal) and central-provincial level (vertical), the NTFC and local trade facilitation mechanisms need to work together. TFP could engage more with the PPCs and local business associations to develop and promote local trade facilitation mechanisms, whether this is an established PTFC or not. From a systems perspective, KIs confirm that the program should be strengthening relationships and channels and continue to make private sector engagement a cross-cutting issue and not a separate component.

Given the trusted customs-business partnership that has been developed over the years, the MOF/GDVC leveraged a C2B communication mechanism to let enterprises comment on the process of formulating new policies or amendments. However, it has not yet encouraged businesses or associations to proactively raise issues for new policies. To date, only a few big companies with lobbying plans can advocate to governmental agencies. VCCI and other associations are not active enough to share updates on WTO provisions and measures with companies because of the shortage of time, human and financial resources. **Businesses would like to see C2B consultation mechanisms strengthened to take advantage of the policy incentives and become compliant.**



RULES

The program has helped to harmonize and simplify rules related to SI and customs procedures. It has chosen a participatory approach to get feedback on these rules. Moving forward, simplification and harmonization of the rules will enable smoother trade facilitation. **Equally important for the private sector is the consistent application of rules.** KIs and survey respondents indicate that inconsistent interpretation and implementation of rules and procedures across all customs departments and line ministries/agencies at both central and local levels are hindering factors that make it unpredictable for import and export-oriented companies to do business, thus, increasing their trade and time costs.



RESOURCES

The customs ICT system has been developed and operating over the years in line with a GVN orientation to building "smart customs" administration. This system is considered a foundation for implementing the NSW, connecting businesses and relevant line ministries. The program's support to GDVC's IT system is crucial to further improve the NSW, resulting in decreasing the time and cost of administrative procedures.⁵⁸ The various surveys, assessments, and diagnostic studies conducted with support from TFP are a key activity, giving the private sector a voice.

Respondents identify that businesses require a convenient platform to look up information they need, leverage their knowledge, and provide their comments to relevant authorities. However, development

⁵⁸ Assessment report on Business satisfaction and time needed to carry out administrative procedures through the National Single Window, VCCI-GDVC-USAID TFP, 2020, p.92

of such an IT-based platform for the exchange among businesses and agencies might impact TFP activities as it might be time consuming and out of the program scope.

Most critical areas for future USAID attention in customs and trade facilitation according to the 5Rs lens:



RESULTS

71 percent of the respondents from enterprises and business associations from the online survey recommended USAID Vietnam to continue focusing its support on simplifying customs procedures to reduce time and costs.



ROLES

The structure of NTFC needs to be reshaped in a way that coordination with the private sector and local involvement will be more effective. The NTFC may need to have certain working groups. In addition, the private sector will need to have a mandate at the NTFC to monitor the relevant ministries/agencies' roles and responsibilities related to trade facilitation.



RELATIONSHIPS

Findings from the online survey show that respondents from enterprises and business associations would like **USAID Vietnam to be a bridge for import- and export-oriented businesses** to have a voice with government agencies/departments to facilitate business activities of enterprises.



RULES

USAID TFP may help with a review of the policy framework to identify which of the WTO TFA provisions provide for private sector involvement in national trade facilitation policy development: Evaluation findings suggest that the greatest contributions to reduce trade costs are likely to come from measures to streamline procedures (2020 CSS) and from advance rulings.⁵⁹ While the impact of streamlining procedures in terms of trade cost reduction is quite clear, advance rulings on issues⁶⁰ might render the implementation of rules/procedures across all Customs Departments and other line ministries/agencies more consistent, hence, more predictable for companies doing business. Findings from the online survey show that enterprises and business associations' respondents recommend USAID Vietnam to focus on regulations and application of goods classification, amendment to Circular 38/2015/TT-BTC and 39/2018/TT-BTC on customs procedures, and other matters related to risk management, origin fraud as well as post clearance audit.



RESOURCES

There is a need for capacity building for both public and private sectors to fill the competency/proficiency gap⁶¹ in trade facilitation and to increase the effectiveness of the GVN's execution of the WTO TFA.

⁵⁹ International Trade Center 2013. WTO Trade Facilitation Agreement: A business guide for developing countries, Chapter 3.

⁶⁰ Advance rulings on issues such as detailed classification of HS code application, interpretation of customs valuation, determination of origin, and advert risk management criteria, etc.

⁶¹ Final Report: Support and Increase the role and effectiveness of the V-NTFC, TFP, Nov 2020, p. 18

Conclusion for EQ 3

The drivers of progress are identified through the 5Rs lens (Results, Roles, Relationships, Rules, and Resources). In terms of results, the reform in customs procedures and SI, with TFP's technical assistance, is a remarkable achievement with the National Single Window (NSW) continuing to be the key focus of NTFC's agenda. GDVC took an important and leading role in customs modernization and trade facilitation of Vietnam, while the NTFC, who should have been a key actor in the progress, did not demonstrate its true functions. To understand relationship dynamics, there has been weak interaction among government agencies in promoting the mandates and responsibilities of the NTFC. At the provincial level, mirroring the national trade facilitation mechanism would limit the utilization of existing provincial trade facilitation mechanisms. The program assisted in simplification and harmonization of trade related rules. Respondents identified the need for more channels and platforms that help the private sector and relevant stakeholders to exchange updated information related to customs and trade laws and regulations.

Taking a systems view, TFP has made most progress in the trade facilitation system aspects relating to Relationships, Roles, and Rules. The program has built trust and confidence with and among host agencies. Roles in implementation were defined and complementary to line Ministries and host agencies as TFP carried out training and capacity support. The new rules introduced by the SI Decree and trade facilitation agenda are coordinating stakeholders toward harmonized implementation. The improvements in Relationship, Roles, and Rules have created a foundation for TFP to drive momentum and consensus on trade facilitation priorities and reform which can support greater progress in the areas of Resources and Results.

EVALUATION QUESTION 4: CROSS-CUTTING ISSUES

To what extent has the activity been gender-responsive in its design and implementation?

TFP's official project document⁶² does not provide any requirements on gender and gender responsiveness, and the evaluation was unable to access sensitive design documents of USAID or Nathan Associates. Thus, the evaluation team is limited in its ability to directly review gender responsiveness in TFP design. However, through reviewing the USAID gender policy⁶³ and TFP's related documents, and from KIs during the midterm evaluation, there is evidence that **the program has integrated gender into program implementation and monitoring and has made some progress from a gender perspective**. Nonetheless, there is also room for improvement in the next two years.

TFP conducted a Gender Assessment from October 2018 to February 2019 which provided a series of gender-related recommendations about management and staffing, capacity development and events, media, data collection, and monitoring and evaluation. This helped TFP develop its Gender Integration Objectives, covering all aspects in implementation such as capacity development; leadership; management and personnel; media and communication; data and monitoring; counterparts, partners and stakeholders; and organizational culture, capacity and policy.

TFP achieved major milestones in implementing the Gender Integration Objectives: TFP trained its staff on gender at the beginning of implementation and briefs any new staff on TFP's gender policy. There are gender-related activities in both FY 2020 and 2021 work plans. Notably, TFP conducted a training in August 2020 on "Gender Equality and Diversity in Vietnam Customs Workplace" for 109 customs officials (63 males and 46 females), including 22 VCS teachers and staff, 28 GDVC civil servants from different departments, 59 local Custom Department officials from 21

⁶² Issued under and as part of Decision No. 1148/QĐ-BTC dated July 9, 2019 of the Finance Minister.

⁶³ Available at [Gender Equality and Women's Empowerment 2020 Policy \(usaid.gov\)](https://www.usaid.gov/gender-equality-and-women-s-empowerment-2020-policy)

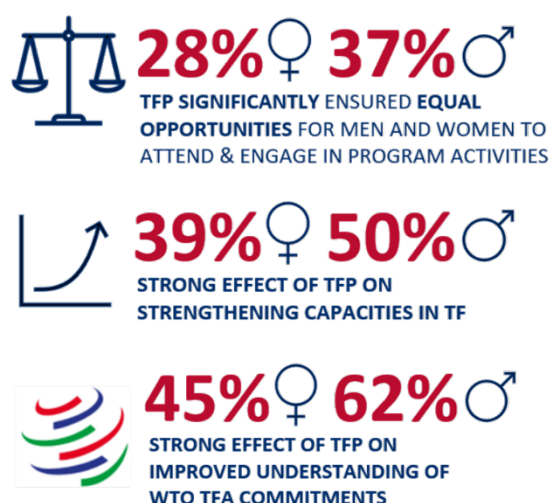
other cities and provinces of Vietnam. This training demonstrated quality by (1) including participants from both central and provincial levels; (2) engaging a number of teachers and staff of VCS who can be more gender-responsive in their training activities in the future; and (3) via the post-training test that showed positive results. For example, 75 percent of trainees agreed or strongly agreed that they had gained new knowledge, and 78 percent said they would apply the newly gained knowledge at work. This might be the first large scale gender training in Vietnam’s Customs—a sector deemed by all interviewed customs officers as “having no gender issues.”

For the first time, gender questions were included in the 2020 CSS which was funded by TFP, and gender related data are being analyzed to inform decision makers.

At the time of the midterm evaluation, the TFP team has 23 staff members, with 17 (or 74 percent) females. TFP collects and reports sex-disaggregated data about training and event participants. According to TFP, there have been 4,625⁶⁴ participants to TFP’s training and events, of which 2,184 (or 47 percent) are female, which far exceeds the “internal target of 30 percent attendance by women at events and training programs.” However, the disaggregation would allow for more insight if broken down by subgroups and among national/provincial levels.

During KIs with both TFP and GDVC’s PMU, most informants responded that “gender is not an issue in trade”, “there is no gender inequality in Vietnam’s Customs”, “this program is about technical issues, not a gender project”, and thus “TFP’s follows a gender-neutral approach in trainings and events.” With this in mind, TFP tends to treat women the same as men in training and events, while, as TFP’s Gender Assessment indicated, “structural gender-based disparities in civil service and gendered differences in information-seeking behavior have the potential to affect equitable participation and benefit for men and women relative to program-supported events.” In the design of training and events, it seems there have been no specific efforts towards “meaningful participation” of women to stimulate women’s active participation and help address their own needs. In this regard, **TFP seems to stop at percentages of female and male participation rather than designing and implementing activities with a gender lens or paying attention to the reasons behind and impact of non-participation.**

Figure 8: Examples of How Women are Less Positive about TFP’s Effects than Men



⁶⁴ TFP tracks participants of each training/event, and then adds up numbers of all training/events. A given person may attend more than one training/event.

Source: Evaluation's online survey about TFP performance

Results of the evaluation online survey manifest disadvantages of the “gender neutral” approach. For example, Figure 8 shows that while 45 percent of female respondents said that TFP support had strong effects on improving their understanding of WTO and TFA commitments, the percentage is higher for males (at 62 percent). It seems women are receiving less from TFP, thus feeling less positive about the program.

While sex-disaggregated data are monitored and collected for each training/event, more could be done to identify gender issues and promoting equal participation and benefits from the program's support, such as monitoring the engagement

and participation of women and men from different sectors (public versus private-sector), different organizations, or their positions at work. Acknowledging gender-differentiated roles and needs can lead to conscious monitoring to pay more attention to diagnose barriers and facilitators for women and men in participating and benefiting from the program's support. The table below illustrates disaggregated participation in TFP trainings and consultation meetings based on raw data from TFP participant lists.⁶⁵

Table 2: TFP Participants in 2018 and 2019 by Categories

Category	% of total participants	Males		Females	Total	% of males	% of females
Private sector	33%	159		152	311	51%	49%
Public sector	67%	346		295	641	54%	46%
• Central level	40%	134		125	259	52%	48%
• Provincial level	60%	212		170	382	55.5%	44.5%
Others	0.3%	2		1	3	67%	33%
Total	100%	507		448	955	53%	47%

Source: TFP, own calculations

While above data show there are no major inclusion issues by sector, the absence of such analytical practice leads to missed opportunities for TFP to use gender analysis to inform decision making and ensure its gender responsiveness.

In the most updated AMELP at the time of evaluation, there are two performance indicators⁶⁶ involving numbers of people trained by TFP, of which the target and performance data are not sex disaggregated.

The notion that “TFP is not a gender project” is prevailing and popular, and since its beginning, TFP has not designed a standalone gender-based activity. TFP has not yet cooperated with any business associations such as promoting development of women led enterprises, supporting export activities of enterprises using high numbers of women laborers, or improving benefits of women laborers in export-led enterprises. The Vietnam Association of Women Entrepreneurs (VAWE) has been in operation since 2014, with branches nationwide including TFP provinces/cities of Hai Phong, Hanoi, Da Nang, and HCMC. The model of “women entrepreneur club” is popular across the country and even exists at district level. The biggest and most deeply rooted mass organization,

⁶⁵ From the name of each participant, it is mostly possible to know his/her sex. And from the name of the organization that he/she belongs to, it is possible to put the participant in question to categories of sector (public or private), and administrative level (central or provincial). While data of 2018 and 2019 in the mentioned list have names and organizations, data of 2020 just do not. So, Table 2 does not contain 2020's data.

⁶⁶ USAID Trade Facilitation Program MEL Plan updated May 2021, Annex I, Page 22, Codes GNDR-8 and DR.2.4-I

Vietnam Women's Union, works to develop women-led enterprises and improve the lives of women laborers. These represent significant outreach opportunities.

Conclusion for EQ 4

Achievements and gaps: TFP follows a regular approach to gender by collecting sex-disaggregated data. Nearly fifty percent of TFP's training and event participants were female, and TFP also conducted gender training for TFP staff and GDVC staff. For the first time, gender questions were included in 2020 CBSS and related data analyzed. Still, gender is considered "neutral" in TFP by only focusing on basic gender dimensions rather than consistently applying a gender responsive approach in design and implementation. Sex disaggregated data are not categorized into different groups to understand possible problems for each specific group/category. There has been no stand-alone gender-based activity or cooperation with women-led associations to pilot women empowerment outreach in trade.

EVALUATION QUESTION 5: LESSONS LEARNED

What are the main lessons learned from TFP's successes and challenges related to trade facilitation?

Based on the main findings and conclusions of the TFP midterm evaluation, the following lessons emerged as reference points for future programs, using the 5R's lens.

Lessons learned from TFP's successes

Lesson 1: Promulgation of general laws/regulations is an effective approach to addressing impediments to trade and business environment caused by specific laws/regulations. (Rules/Results) As Vietnam has fragmented governance (departmentalism), any specific laws and regulations could impose impediments to trade regardless of international commitments. An effective way to overcome impediments to trade is to pursue the promulgation of a general law to prevail over specific regulations. In Vietnam and similar transitioning economies, such a general law is regularly drafted by one sponsoring ministry/agency and will face objection from other line ministries during the promulgation process. Such objection can only be overcome with a supra-ministerial mechanism. In the Vietnamese context, the Government Prime Minister, Deputy Prime Ministers with Politburo memberships and support from the OOG, and MOJ, and some other agencies can bring the sponsoring ministry to surpass other objections. Strategic investment in a set of decision makers is recommended to form national political will and mobilize a critical mass.

Given the presence of a supra-ministerial mechanism, external assistance is required i.e., public voice and pressure as well as experts' opinion to persuade stakeholders who have their vested interest and motivations. Bringing in international experience and experts to show examples of success and experience in harmonizing conflicting laws/regulations would foster consensus and finalize the comprehensive reform.

Lesson 2: Investment in building trust and relations with host and sponsoring agencies is one key determinant to program success. (Resources/Relationships) Engaging the Vietnamese local system to adapt or respond to reform requires some key determinants: First, sufficient time/resources to spend on relationships and trust building prior to program design and during implementation. As policy coordination aims to enhance the alignment of line agencies, relationship and trust building are a foundation to reduce redundancy/contradictions among specific policies and line agencies and between the host agencies and donors. At the beginning of

implementation, GDVC did not acknowledge TFP's focus on 'trade facilitation' but tried to gear TFP into a customs centered program. TFP secured GDVC's buy-in through certain actions, including:⁶⁷

- TFP repeatedly conveyed the big picture of trade facilitation, with customs issues and SIs as integral parts of this picture, to gather momentum for reform. TFP activities induced top-down pressure from Prime Minister and Government Offices. TFP highlighted the enhancement of C2B partnership and also created bottom-up pressure for change through various workshops and training activities to get the private sector's inputs and monitoring;
- In response to ad-hoc and/or urgent technical assistance requests with insufficient lead time, TFP promptly recruited highly qualified experts, allowing TFP to provide technical assistance in a timely manner and substantially contribute to the implementation of several activities (e.g., the review of circulars 38 and 39, conducting the SILR);
- To mitigate GDVC's initial reluctance in supporting the implementation of activities in provinces, TFP addressed this challenge by organizing workshops in Hanoi for customs representatives from all targeted provinces and localities of the provincial trade facilitation coordinators and agreeing with GDVC on carrying out bi/monthly visits to the provinces.

TFP successfully mitigated the effects of GDVC's approach to its activities and built a mutual trust with GDVC. The GDVC and PMU eventually supported and helped coordinate with targeted customs offices to promote trade facilitation efforts as well as to motivate relevant activities in the localities.

To foster the information and knowledge exchange among agencies, it is crucial to strengthen interaction among stakeholders. From the example of the Decree on SIs, a lesson is to identify a reform cluster and supporter network (beyond the conventional approach of focusing on individual champions) that can win over conservative defense and resistance. To that end, TFP and GDVC/PMU are recommended to extend strategic investments/interventions to such networks at all levels (at national level: policy influencer/policy makers; at local level: policy implementers) and leverage informal networks and interpersonal connections to overcome information asymmetry and barriers between line ministries.

Lesson 3: A powerful champion is important in triggering reform. (Roles/Rules) The study tour, which was organized in 2019 by the program to the US Customs and Border Protection for GVN high level officials and led by the Vice Minister of Finance to learn about modern customs management, inter-agency, and private sector cooperation, was key to develop concept and practice buy-in from GVN leaders and then speeding up SI reform. As a result of this study tour, the Vice Minister of Finance became a champion for triggering reform of the SI Scheme. Finding a true champion will help keep support activities on track.

Lessons learned from TFP's challenges

Lesson 4: Fragmented governance can be solved by joined action of agencies and coherent policy. (Roles/Relationships/Rules) The program did the "right" thing in strengthening the role of the NTFC, but the single "right" thing may not be effective enough. A feature of Vietnam's political system is central control with fragmented governance. Cross-cutting issues or coordination policy that would be dealt with in other countries by Government leaders, are decided in Vietnam by so-called "Steering Committees" to seek strong consensus. It is the root of trade impediments through long existing SI measures and other technical barriers. The NTFC is not the only avenue for trade facilitation, and it needs time and investment to be equally footed on its four legs/mandates.⁶⁸ If one

⁶⁷ 2018 APR – p. 27; and 2019 APR – p. 18&19.

⁶⁸ NTFC mandates: (1) implement the NSW/ASW, (2) coordinate reform of specialized inspections, (3) coordinate and implement the WTO TFA provisions, and (4) logistics development.

steering committee is not enough, one can work with several committees to carry out the trade facilitation agenda.

Apart from the NTFC (1899 Committee), there are two other Steering Committees (the National Steering Committee Against Smuggling, Trade Fraud and Counterfeit, often referred to as “the 389 Committee”, and the Administrative Reform Committee) to foster central coordination on trade facilitation. In the Vietnamese context, trade facilitation is widely connected to compliance which suggests a role for the 389 Committee. To implement trade facilitation nationwide, the presence of 389 Committees and Administrative Reform Committees at all provinces/cities can supplement the gap if PTFCs are absent. The key lesson is taking advantage of existing platforms/mechanisms that can bring a program into full effect. As the decentralization process continues in Vietnam, future programs of USAID should take this into account for implementation.

Lesson 5: If donor proposals for local activities are not aligned with local conditions and priorities as well as not harmonized with the national agenda, it can adversely affect local trade facilitation initiatives. (Roles/Resources/Results) The program that started in May 2018 could not do preparatory assessments for activities with stakeholders at the provincial level prior to the official ODA approval in July 2019. This appears to have contributed to challenges in getting buy-in from provincial stakeholders and delayed progress in national-provincial coordination. Formal commitment from the six target provinces should have been sought much earlier, preferably prior to the design of the program, and not only after the program’s start. There is a different level of interest in target provinces to implement local trade facilitation initiatives. Some provinces showed their interest in establishing local trade facilitation sub-committees under leadership of respective PPCs and DOITs, while others still felt hesitant to have a separate sub-committee because of their effective existing mechanism. Trade facilitation becomes difficult when different provinces are doing procedures differently from what has been agreed to in trade agreements, laws, or rules issued at a central government level. The proposals for local activities should be aligned with local conditions and priorities. Also, despite the format or shape of provincial trade facilitation mechanisms, local initiatives should be carried out in line with the agreed-upon trade facilitation agenda at the central level. This ensures that Vietnam's trade facilitation efforts are harmonized and consistent.

Lesson 6: Highly technical programs can also benefit from a gender responsive approach. (Roles/Results) Gender responsiveness needs more than equal numbers of participants from both sexes. Under the gender lens, women are different from men so their needs should be addressed in a different and appropriate way, which should ensure equal, meaningful participation, and responding to the gender differentiated roles and strategic needs. TFP’s effects may have been more inclusive if proper gender responsive efforts in designing and implementing the activities had been in place.

Conclusion for EQ 5

Lessons learned from TFP’s successes:

- Lesson 1: Promulgation of general laws/regulations is an effective approach to address impediments to trade and business environments set forth by specific laws/regulations. (Rules/Results)
- Lesson 2: Investment in building trust and relations with host and sponsoring agencies is one key determinant to program success. (Resources/Relationships)
- Lesson 3: A powerful champion is necessary in triggering reform. (Roles/Rules)

Lessons learned from TFP’s challenges:

- Lesson 4: Fragmented governance can be solved by jointed action of agencies and coherent policy. (Roles/Relationships/Rules)

Conclusion for EQ 5

- Lesson 5: If donor proposals are not aligned with local conditions and priorities and not harmonized with the national agenda, it can adversely affect local trade facilitation initiatives. (Roles/Resources/Results)
- Lesson 6: Highly technical programs can also benefit from a gender responsive approach that enhances program effectiveness and achieves better results. (Roles/Results)

RECOMMENDATIONS

The evaluation team reviewed the following recommendations with USAID and TFP during a utilization workshop, and Annex X documents the actions planned by USAID and TFP to implement these recommendations.

RECOMMENDATIONS FOR TFP

RECOMMENDATION 1: STRENGTHEN NTFC'S FUNCTION

Streamlining of SIs and an efficient implementation of the WTO TFA require the program to prioritize its cooperation with NTFC.⁶⁹ NTFC needs to be representative for its two main stakeholder groups: private sector and line ministries and agencies.

1. **Support activating a working level network among NTFC's member ministries:** According to KIIs, the program should not prioritize its efforts in the coming two years to change the organizational structure of the NTFC but rather to make it operational. TFP should support the activation of a working level network designated by the ministers in the field of SI and import-export related activities to work directly on trade facilitation issues. This will depend on the willingness of the GVN. According to TFP, the NTFC report will be discussed in the next NTFC meeting.
2. **Support activating a working level network between line ministries and private sector:** TFP could support activating a working network between line ministries and the private sector for better mutual understanding and trust which will ease the implementation of relevant SI procedures as well as other trade facilitation efforts. TFP plans to do this with VCCI.
3. **Provide evidence-based messages to NTFC:** TFP could provide the new NTFC chairman and ministerial representatives with tailored messages from the evidence-based studies supported by the program (e.g., Report on SI Legal Review, surveys) showing the impact on trade facilitation matters and practical solutions thereto. TFP plans to do this in cooperation with GDVC and VCCI separately.
4. **Support VCCI's role in leveraging the private sector voice to NTFC leaders:** TFP could support VCCI's by compiling information and messages about trade facilitation from trade-related business associations and trade facilitation mechanisms to present them to NTFC leaders. NTFC should connect with those business associations which are involved actively in the biannual meetings with the Prime Minister and business community. Multinational enterprises advocate their needs through other channels (such as the US-ASEAN Business Council or VBF). TFP plans to do this in Year Four of implementation.
5. **Continue support for better usability of NSW:** According to KIIs and FGDs, the program should continue to support the upgrade of the NSW to have a more stable and faster performance, e-payment, and digital signatures and improved interconnectivity between ministries to reduce processing time. The program should continue to provide technical assistance through an IT expert who monitors the procurement and implementation of the upgrade to GDVC's IT system. TFP plans to do this in Year Four of implementation.

RECOMMENDATION 2: PROMOTE PROVINCIAL TRADE FACILITATION

1. **Address provincial trade facilitation priorities (bottom-up):** The program needs support from PPCs and local business associations to make provincial trade facilitation effective. The PPCs will listen to the voice of business associations and represent them to the line ministries. In turn, the program should address provincial trade facilitation priorities with support from local business associations and PPCs in a bottom-up approach, aligned to mandates of existing organizations:
 - Focus on effective implementation of local trade facilitation initiatives.

⁶⁹ 2019 PEA, p2, 42; NTFA Situational Report,

- Provide training to state agencies and the private sector on general risk management, for example risk based inspection practices, to achieve compliance at central and provincial levels because the implementation of SI Decree and other regulations requires understanding of risk-based approaches for both state agencies and private sector.
 - Take advantage of existing social network groups/working groups between local customs and import-export companies to facilitate effective information exchange regarding customs and SI procedures. The TFP team has included several related activities in its upcoming work plan and will also address part of these activities with VCCI.
2. **Strengthen provincial trade facilitation mechanisms:** The program could support provincial trade facilitation mechanisms in their functions:
- Assist the provincial trade facilitation mechanisms to activate a working level network from each line department and business associations, consisting of officials who work directly with trade facilitation issues, and train them in the concepts of trade facilitation, WTO TFA, and FTAs. The TFP plans that VCCI will assist on this.
 - Get the private sector involved in the provincial trade facilitation mechanism to effectuate trade facilitation and customs reform. TFP could take advantage of the C2B partnership which has been officially developed since 2014⁶⁹ to elaborate a detailed plan for engaging more private sector to get input of industry diversity.
 - Assist the provincial trade facilitation mechanisms to have regular, official connection with both VCCI and nationwide specific goods/commodity associations to be more informed about specific trade facilitation efforts (e.g., most imports and exports coming through Quang Tri border gates are from enterprises not based in Quang Tri).

RECOMMENDATION 3: FURTHER HARMONIZE PROCEDURES AND STRENGTHEN COMPLIANCE

1. **Train and develop capacity of other line Ministries:** As the SI Decree is yet to be promulgated, technical assistance from TFP (especially training) should be balanced among line Ministries. TFP should consider assisting line ministries with their specific and identified areas of interest, such as energy efficiency under MOIT or quality control of imports under MoST. Bringing in international experts in SI and risk management with review/recommendations on harmonizing SI procedures could strengthen the training and capacity building involved in SI implementation effectiveness by line Ministries. TFP plans to do this in Year Four of implementation.
2. **Improve communication about TFP:** TFP and GDVC/PMU should improve the effectiveness of inter-agency communication regarding its work plan and updates on TFP implementation to facilitate their acceptance and cooperation.
3. **Train on general risk management for more compliance:** TFP should provide training not only to state agencies but also to the private sector on the general risk management to provide them with risk-based approaches and promote to achieve compliance toward risk-based management at both central and provincial levels.. The training outreach can be coordinated with national and provincial business associations. TFP plans to do this in Year Four of implementation.

RECOMMENDATION 4: ENHANCE PARTNERSHIPS BETWEEN CUSTOMS AND PRIVATE SECTOR

1. **Expand partnerships:** TFP and GDVC/PMU should expand enhancing partnerships with the private sector beyond the Customs network. Specifically, we recommend MARD as one of the prioritized partners given the new Minister is known as a champion of private sector engagement.⁷¹

⁶⁹ Decisions No. 1005/QĐ-TCHQ dated March 31, 2014 and 2736/QĐ-TCHQ dated September 19, 2018 on developing a Customs-Business partnership and related parties.

⁷¹ The new Minister of MARD is known for his initiatives of entrepreneurs' coffee talks every Saturday at his home province and received great support and participation from the business community.

2. **Assist ministries to communicate to businesses:** TFP should consider assisting ministries to summarize implications of trade-related regulations in understandable manner to businesses and be open to questions by private sector.
3. **Develop capacities of business associations:** Enhancing partnerships also means building capacities of business associations in communicating feedback from their members to policy stakeholders.
4. **Share good practices of self-compliance:** The self-compliance model could be fostered through drawing lessons from businesses demonstrating good practice with customs and other import-export related procedures. These should be shared through existing networks, especially the C2B channel. TFP and GDVC PMU should consider supporting C2B social networks/working groups for effective information exchange on customs and SI procedures.

RECOMMENDATION 5: STRENGTHEN GENDER RESPONSIVENESS

Adapt a more gender-responsive approach in the remaining annual work plans:

1. **Conduct diagnosis:** TFP should consider diagnosis of why women responded consistently less favorably than men in assessment of TFP during the online survey to be more gender responsive when designing future activities. At the very least, it is necessary to review findings and recommendations of the Gender Assessment to see if designs and implementation of activities are gender responsive enough and have appropriate actions.
2. **Design gender-responsive trainings/events:** Trainings and events should be designed in a way that encourages women's and particularly women business leaders' participation. Once the aforementioned diagnosis has shed light on gender barriers, TFP should add to consultants' Terms of References requirements about how the training contents and organization can be more gender responsive and use them as part of the assessment criteria when selecting consultants and managing consultants' performance afterwards.
3. **Deepen the use of sex-disaggregated data** to understand gender issues and barriers that link to participants' professions, roles, and organizations. Gender data should not only be about percentages of males and females, but also about how women participate "meaningfully" in the training/event in terms of how their different needs are addressed.
4. **Cooperate with women-led business associations** to seek ways to help promote development of women-led enterprises and/or improve benefits of women laborers. VAWVE, the system of women entrepreneur clubs, and possibly the young Vietnam-ASEAN Association for Women Entrepreneurs (VAAWE) can be potential partners of TFP. Besides, designing and implementing a standalone gender-based initiative would be a highlight in TFP's gender work, possibly in cooperation with a women-led business association. It could become a gender-based starting point for future TFPs in Vietnam to build on.
5. **Compile and strongly message gender-related lessons from the 2020 CSS and other research** to MOF and other ministries/agencies to help improve gender responsiveness of processes to build trade related policies/legal documents in the future.

RECOMMENDATIONS FOR USAID

RECOMMENDATION 6: ENGAGE THE VIETNAM LOCAL SYSTEM TO ADAPT OR RESPOND TO REFORM

1. **Resources/relationships:** Invest sufficient time and resources in **relationships and trust building** prior to program design and during implementation.
2. **Resources/relationships:** Strengthening interaction among stakeholders should take the following elements into account: (1) Identify a reform cluster and supporter network (beyond the conventional approach of focusing on individual champions); (2) Extend strategic

investments/interventions to such network at all levels (policy influencers/policy makers at national, and policy implementers at local levels); (3) Leverage informal networks and interpersonal connections to overcome information asymmetry and line ministry barriers.

3. **Rules/roles:** Institutional and legal reforms need to be gender responsive

RECOMMENDATION 7: SUPPORT THE PROMULGATION OF GENERAL LAWS/REGULATIONS AS AN EFFECTIVE APPROACH TO ADDRESS IMPEDIMENTS TO TRADE AND BUSINESS ENVIRONMENT CAUSED BY SPECIFIC LAWS/REGULATIONS

1. **Resources/relationships:** Strategically support a cluster of decision makers that can fuel national political will and mobilize a critical mass to harmonize conflicting laws and regulations. (The SI Decree is a living lesson.)
2. **Resources/relationships:** Support to increase the quality of multi-stakeholder consultations. This can help to improve the specific law-making processes and bring policy harmonization to a higher ladder.
3. **Resources/relationships/rules:** Bring in international experience and experts to foster consensus on harmonizing conflicting laws and regulations.

UTILIZATION PLAN

In November, the evaluation team shared findings, conclusions, and recommendations with the IP to jointly agree on how to operationalize recommendations, collaborate, and follow-up on progress. During the out-brief with USAID, the team presented findings, conclusions, and recommendations to Mission staff. The draft of the evaluation report was shared with USAID and the IP for feedback. Then, Learns facilitated a utilization workshop with USAID and the IP in December to develop a post-evaluation action plan that documents how, when, and by whom the recommendations will be implemented (see Annex X).

As primary users of the evaluation report, USAID—including Front Office, Program Development Office, and technical offices—can use the evaluation’s findings and recommendations to formulate future activity designs in Vietnam in trade facilitation. USAID can also use the evaluation results to communicate with TFP about the program focus and prioritize activities for the remaining months. The evaluation can result in early engagement of GVN counterparts in future programs specifically focused on trade and investment opportunities and key lessons learned from the 5Rs system findings.

ANNEX I: FULL LISTING OF REFERENCES AND REPORTS UTILIZED

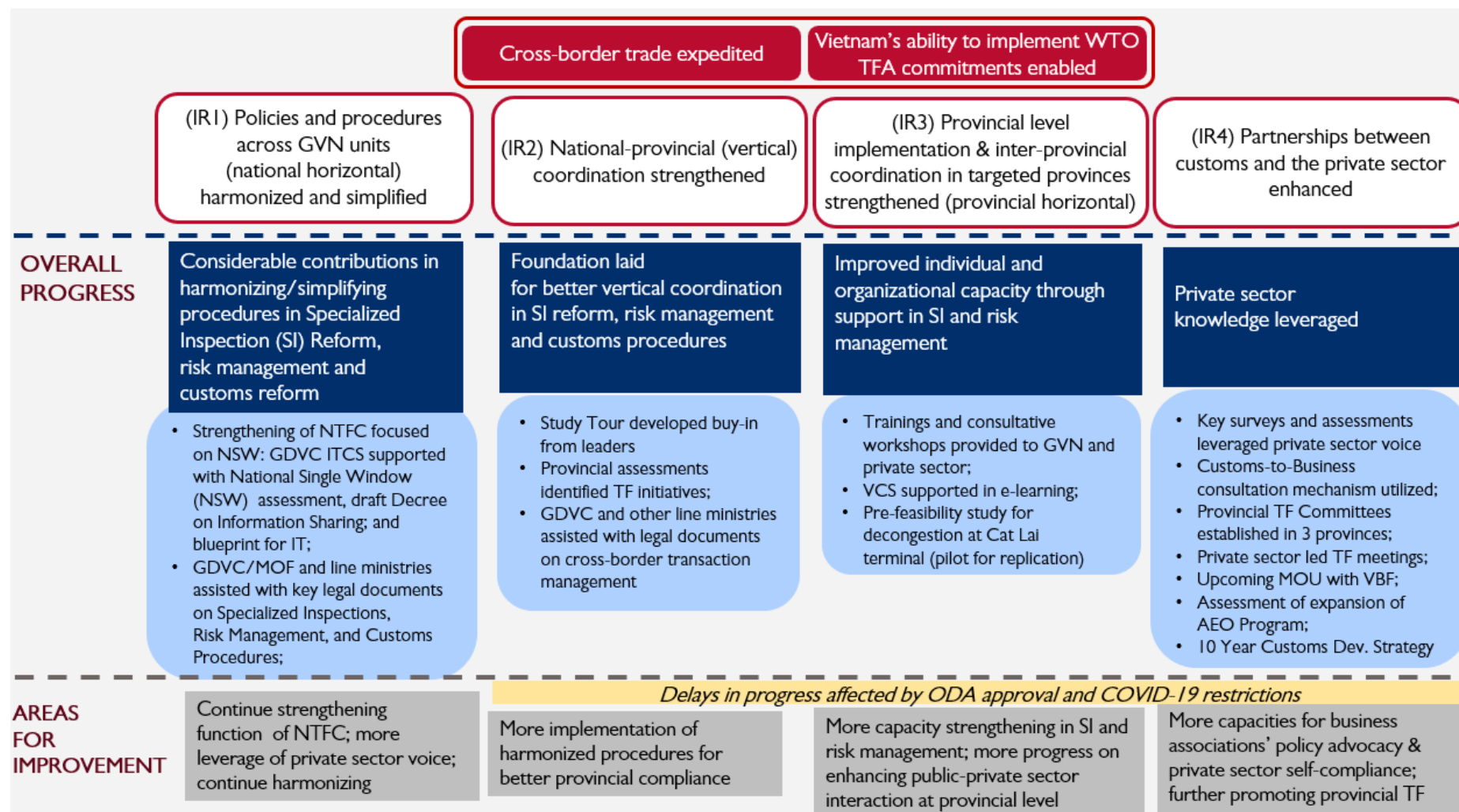
No	Title of the Documents
1	TFP Midterm Evaluation Statement of Work
2	USAID Contract with Nathan Associates, Inc. for the implementation of TFP, including the Terms of Reference and the Scope of Work
3	Project Document, ratified by the GVN (Decision 1148/QD-BTC dated July 9, 2019)
4	Project Approval Document (PAD), if different from the Project Document
5	Final list of GDVC's assistance request for Technical Assistance if available
6	Provincial-Selection Report (February 2019)
7	Any summary sheets of TFP achievements (success stories) and shortcomings
8	USAID TFP-MEL Baseline Report (February 2019)
9	USAID TFP Activity Monitoring, Evaluation, and Learning Plan [AMELP] (approved June 15, 2021)
10	USAID TFP: Reflection and Planning Workshop (July 1, 2019)
11	Overall Work Plan (Five-Year Work Plan)
12	First Annual Work Plan 2018–2019
13	Second Annual Work Plan (October 2019–September 2020)
14	Third Annual Work Plan 2020–2021
15	Fourth Annual Work Plan 2021–2022
16	Pause and Reflect Workshop Report (July 10, 2020)
17	Annual Progress Report (June 1–September 30, 2018)
18	Annual Report (October 2018–September 2019)
19	Annual Report (October 2019–September 2020)
20	Quarterly Report for FY 2021 (October 2020–December 2020)
21	Quarterly Progress Reports (January 2021–March 2021)
22	Quarterly Progress Reports (April–June 2021)
23	Annual Survey related to indicator CBLD-9 Percent of USG assisted organizations with improved performance
24	List of seven departments receiving capacity development assistance and contact persons related to indicator CBLD-9
25	Human and Institutional Capacity Assessment related to indicator CBLD-9, if available
26	List of training participants with email
27	Training reports with aggregated training participants feedback (incl. pre-and post-course assessments), if available
28	List of Key Informant Recommendations (July 1, 2021)
29	Integrating gender into TFP design and implementation (December 19, 2018)

No	Title of the Documents
30	USAID TFP Gender equality and diversity in Vietnam Customs Workplace (September 2020)
31	Project Communication Strategy and Plan, FYs 2019 and 2020
32	Project Branding and Marking Plan
33	Private Sector Engagement Strategy and Plan
34	Revised Report - The Political Economy of Trade Facilitation in Vietnam: SI(February 10, 2019)
35	2018 Customs Satisfaction Survey
36	2019 Customs Satisfaction Survey
37	Situational Assessment Report on Trade Facilitation in selected provinces (December 2019)
38	Technical report on SI Legal Review (Event reports in Dalat, December 18–21, 2018, and in Hue, May 15–17, 2019)
39	An Assessment of compliance costs of administrative procedures in customs [CAPCI] (May 2020)
40	Assessment Report “Business Satisfaction and Time Needed to Carry Out Administrative Procedures through the NSW” (May 2020)
41	Draft final Report on Review and Situational Assessment of Vietnam Trade Information Portal (December 2019)
42	Final Report: Support and increase the role and effectiveness of the Vietnam Trade Facilitation Committee (November 2020)
43	Minutes of any PSC meetings

ANNEX II: FULL LISTING OF PERSONS INTERVIEWED

The full listing of persons interviewed was submitted separately in line with data de-identification policies. Please contact Phuong Pham, phuong.pham@socialimpact.com, to request the data.

ANNEX III: RESULTS FRAMEWORK WITH PROGRESS UP TO DATE & AREAS FOR IMPROVEMENT



ANNEX IV: STAKEHOLDER ANALYSIS MATRIX

Stakeholder	Engagement or Role with respect to TFP (Level of centrality)	Influence toward TFP (High, Medium, Low)	Attitude toward TFP (Positive, Neutral, Negative)	Inhibiting factors/Challenges	Motivating factors/Opportunities	Strategies for engagement
GVN, trade policy makers, influencers						
Office of the Government (OOG)	Deputy Prime Minister is chair of NTFC – a stakeholder to TFP; Ratify the project for its official implementation	High	Neutral	Overloaded with many proposals and review on policy development	Keen on reform; Powerful in coordination of government agencies at both national and provincial levels; Commitment to improving the business environment;	To attend more to the PSC for influencing and pushing other ministries than MOF; To raise profile for the NTFC with engagement of more private sector
MOF	- Project Steering Committee (established by Decision 1740/QD-BTC dated Aug 30, 2019) - The Minister is Vice Chair of NTFC; - Direct beneficiary	High	Positive	Reliance on GDVC (PMU) performance as they consider most activities through GDVC's view.	Keen on reform; Leadership's interest in USAID TFP activities; Vice Minister is considered the champion in trade facilitation	To improve/shift mindset of some leaders and staff assisting NTFC from major focus on NSW/ASW to more trade facilitation matters
Ministry of Industry and Trade (MOIT)	- Other direct beneficiary of USAID TFP; - A Ministry leader is Deputy Chairman of NTFC - Member of the NTFC - MOIT: On top of list of ministries of being behind schedule for new laws,	High, if committed	Focal point from Division of Science & Technology; KI from Trade Remedies Dept. relies on personal network	High workload; Insignificant role of focal point in presenting and connecting MOIT's demands and TFP's activities.	GVN wants ministries to work together; MOIT is proactive in its assigned mandate (i.e., logistics development) and well connected with logistics/forwarding companies	To enhance the coordinating role of the MOIT focal point to take advantage of TFP's support; To build up the partnership with business associations and business sector

Stakeholder	Engagement or Role with respect to TFP (Level of centrality)	Influence toward TFP (High, Medium, Low)	Attitude toward TFP (Positive, Neutral, Negative)	Inhibiting factors/ Challenges	Motivating factors/ Opportunities	Strategies for engagement
	promulgating circulars, so how can VN customs enforce					
Ministry of Agriculture and Rural Development (MARD)	- Other direct beneficiary of USAID TFP; - Member of the NTFC - Legal Dept. = focal point for TFP - MARD has good connection to Think Tank (neutral position, can raise voice on behalf of enterprises) under MPI	High (key role: in WTO TFA commitments; key for SI)	Negative towards NTFC: no preparation in last two years	Dilemma: Ring fence their power; involvement in TFP's proposed activities may reduce the authority of MARD; Limited resources; reluctant to receive support to regulatory assessment, while this is important, because resources go to external expert rather than MARD	GVN wants ministries to work together; Get help from TFP with private sector consultation and expert opinion No legal document will be passed by MOJ without a regulatory impact assessment; Use study tour in a smart way to trigger changes	Key activities: Study tours to US, EU, Singapore for amendment of laws on SPS procedures (to get evidence for good practices; make it easier to pass legal document; personal network aspect during study tour); US expert/ national expert on regulatory impact assessments; To build up the partnership with business associations and business sector
MPI/ CIEM (Central Institute for Economic Management)	- MPI is member of NTFC - CIEM is Think Tank (neutral position, can raise voice on behalf of enterprises): it is considered equal to a sort of general department for economic R&D; having authority and pathway to access everyone in the GVN; ▪ Key role in GDVC reform: GDVC uses CIEM to bounce back	Medium	Positive	Workload. If they take on too much work, concern about their quality on TFP activities if any.	Work closely with the Customs Reform and Modernization Board and TFP for commissioned research (input to SI legal doc.), customs satisfaction survey with technical input, and new customs development strategy of GDVC	Aware of gradual continuation of reform; CIEM can provide workshops for the GVN staff and private sector;

Stakeholder	Engagement or Role with respect to TFP (Level of centrality)	Influence toward TFP (High, Medium, Low)	Attitude toward TFP (Positive, Neutral, Negative)	Inhibiting factors/Challenges	Motivating factors/Opportunities	Strategies for engagement
	customs system for reform; - Position as neutral angle; leaders from provincial customs prefer listen to CIEM - Very active member advocating for national reform (Champion for WB Doing Business, WEF) - Main pillar representing private sector working based on evidence-based research				Key role from predecessor GIG and STAR projects; Keep them in the frontline of reform	
MOST	- In charge of quality control and standardization - Member in NTFC - On top of list of ministries being behind schedule for new laws, promulgating circulars, so how can VN customs enforce	High (positive if they can be committed)	Negative role in trade facilitation and negative attitude towards TFP	MOST is not keen about reform, because it impairs their power for quality control. Most of clearance delays come from them.	Implementation of reforming requirements as pushed by the Government	To develop working level network to promote the coordination between PMU/TFP and government agencies, and facilitate the program activities; To build up the partnership with business associations and business sector as similarly the C2B partnership development.

Stakeholder	Engagement or Role with respect to TFP (Level of centrality)	Influence toward TFP (High, Medium, Low)	Attitude toward TFP (Positive, Neutral, Negative)	Inhibiting factors/ Challenges	Motivating factors/ Opportunities	Strategies for engagement
MOT (KI with Port Authority)	- Member in NTFC; - TF has made progress in last 2-3 years: Improved perception of customs procedures: procedures and compliance and enforcement is more acceptable to private sector now; but coordination between customs and other agencies remains big challenge;	High if they can be committed	Negative	Poor coordination between GDVC and Port Authority; Unclear coordination and involvement in TFP activities	Implementation of reforming requirements as pushed by the Government	
Other relevant ministries	- Other direct beneficiary of USAID TFP; - Member of the NTFC	--	--	Unclear coordination and involvement in TFP activities	Implementation of reforming requirements as pushed by the Government	
Provincial People's Committee (PPC)	- Not represented in NTFC - Coordinator of policy implementation - Promotion of economy and commerce, and PSE at provincial level; - Host TF (sub-)committee/TF mechanisms in provinces; - Indirect beneficiary of TFP;	High influence in terms of policy implementation; Moderate in terms of policy making influence	Neutral	Constrained by Ministry of Home Affairs in terms of forming new committees (piloting first, then review if it functions); Loose inter-agency coordination mechanism;	Provinces have similar: Inv. Promotion Agencies, Econ. Dev. Agencies, International integration Agencies, etc. – if these are in place, then TFP should connect with such bodies	To focus on the effective and feasible activities rather than newly established TF sub-Committees; Leading role of knotting ties with businesses/BA and getting them in trade facilitation involvement at provincial level

Stakeholder	Engagement or Role with respect to TFP (Level of centrality)	Influence toward TFP (High, Medium, Low)	Attitude toward TFP (Positive, Neutral, Negative)	Inhibiting factors/ Challenges	Motivating factors/ Opportunities	Strategies for engagement
GVN, trade policy facilitators						
NTFC	- Direct Beneficiary of TFP - Supposed to perform a lot of things (NSW/ASW stand far in front of them; TF stands at the bottom) - Few tangible products to sell (NTFC Assessment Report, NSW Satisfaction Survey)	Should be high (but no constant effort)	Neutral	Relies on top-down approach; not sustainable; Its structure is not flexible to admit more members from business associations and businesses	Make members of NTFC more active: Needs 4-5 champions from MARD, MOT, MOIT, MOST, like MOF	More focus on trade facilitation (shift from focus on NSW); To seek a mechanism of efficient working with all relevant stakeholders
GDVC	- Project owner; Set up PMU - Main and direct beneficiary; Coordinator with USAID TFP; Performer of most of the project activities so far; - Focal point of NTFC for NSW, SI, and trade facilitation	High	Positive	GDVC are in a weak position to influence and coordinate with line ministries to implement activities, therefore, they use program resources. Even reaching the MOF is difficult, must get attention through VCCI or CIEM. Functional depts. wanted to implement their short-term tasks through the program;	GDVC is very keen on reform; TFP is a unique experience, working with a department at sub-ministry level (i.e., very specific workplan and can reach out easily to the provinces); easy for TFP to integrate into reform activities of customs; Customs have special connection with enterprises, find same momentum of reform, therefore many reforms by customs supported by PS, TFP	PMU management and operation: (1) more transparent, frequent meetings; (2) quarterly/ bi-monthly bulletin with monitoring results; (now four full-time staff); (3) communication among departments and coordination with other ministries and departments to be improved; (4) Long-term vision, not short-term activities into work plan

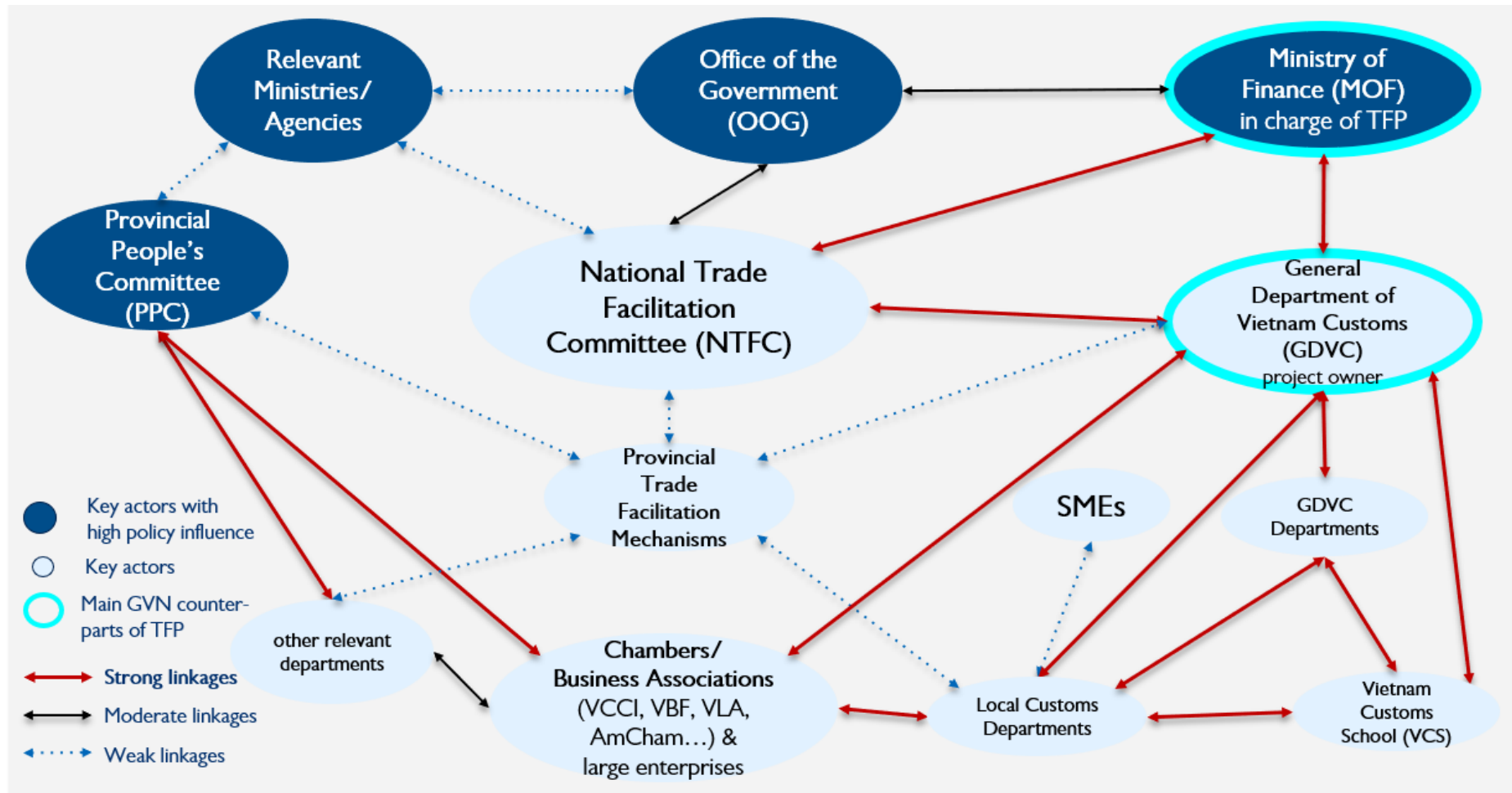
Stakeholder	Engagement or Role with respect to TFP (Level of centrality)	Influence toward TFP (High, Medium, Low)	Attitude toward TFP (Positive, Neutral, Negative)	Inhibiting factors/ Challenges	Motivating factors/ Opportunities	Strategies for engagement
					push up the momentum; Feel internal pressure from leaders of GDVC and program, many activities behind schedule	
Provincial Trade Facilitation Mechanism	Three provinces with newly established TF mechanisms: no activity yet; Other target provinces: Provinces which already have their own mechanism in place, interested in working with the program, even if the TFC is in place, they do not know what to do through their provincial TF mechanisms	High	Neutral	Programmed challenge when program requested local initiatives on TF; DOIT led TFC sub-committee gets wish list; In many provinces enterprises and even certain local agencies are not aware of WTO TFA;	Establishment of the PTF sub-committees is an achievement. Now challenge is to get it operational (very poor representativeness of business community)	To have detailed action plan in alignment with TFP activities; To have strategy for private sector involvement.
GVN, trade policy implementers						
Local Customs Departments	Support TFP activities if they are conducted in respective provinces;	Medium	Positive	No clear mandate in coordination with other line agencies	Keen on reform and Developed C2B partnership in line with the customs development strategy	Capacity building; Enhancement of C2B partnership
Other relevant departments/ agencies	Participation to PTFCs if required	Unclear	Unclear	Some local departments may not have full awareness of the program and WTO TFA	Implementation as instructed and requested by the PPCs	Capacity building; To develop a plan to connect more with PS/BA and to implement TF activities in accordance

Stakeholder	Engagement or Role with respect to TFP (Level of centrality)	Influence toward TFP (High, Medium, Low)	Attitude toward TFP (Positive, Neutral, Negative)	Inhibiting factors/ Challenges	Motivating factors/ Opportunities	Strategies for engagement
						with Work plans as agreed with TFP
Private sector						
Small- and medium-sized enterprises (SMEs)	- Participants to TFP activities (mainly training and workshop); - Indirect beneficiary	High, if they are aware of TFP and involved	Unclear	Not aware of WTO TFA nor TFP support; Not much interest in policy development;	Attending to small groups in connecting with local customs agencies; The success of the customs reform and SI Scheme will significantly impact SMEs' business	To improve SME's awareness toward WTO-TFA, hence TFP activities
Large enterprises	- Participants to TFP activities (mainly training and workshop); - Indirect beneficiary	High if committed	Neutral	Inactive participation to policy development	Have their own lobby plan/resources to advocate to the government agencies for their group interests	To coordinate with and raise voice representing all businesses in the association they are members of
VCCI	- Indirect beneficiary; - Voice to PS; - Representative of the business sector on NTFC, - In position to advocate for reform	High	Positive	- Recent change of VCCI leadership (takes time to gain recognition); - Overload with many mandates and involvements on quality may be impact; - Shortage of financing and resources to update all businesses on WTO TFA;	Recognized voice to advocated for reform in NTFC	Continue CSS and communicate its findings to the GVN; Coordinate with TFP and other business association for the bottom-up approach

Stakeholder	Engagement or Role with respect to TFP (Level of centrality)	Influence toward TFP (High, Medium, Low)	Attitude toward TFP (Positive, Neutral, Negative)	Inhibiting factors/ Challenges	Motivating factors/ Opportunities	Strategies for engagement
				- Lack of representation of SMEs		
Other Business Associations	Indirect beneficiary	Medium	Neutral	Not much aware of the program	Have strong understanding of the businesses and industry they represent; Some associations are active in advocacy for their own business sector's interest	Involvement of other associations/chambers; not only focus on VCCI
Mass media	Participants to TFP activities (mainly training and workshop); Dissemination of information related to TFP activities	Medium	Neutral	Not much aware of the program	Have good means in dissemination of policy and sharing information	Development of media coverage to create awareness about a specific challenge and/or success stories of TFP activities
Training institutions						
Vietnam Customs School (VCS)	Beneficiary of the project	Medium	Positive	Under the authority of GDVC; Little relationship with business associations and business communities	Have good connections with customs offices nationwide; Interest in and willing to reform and digital lecturing methods; Training delivery to some customs brokers	Implementation of e-learning system and develop the self-compliance learning program
IP						
Nathan Associates	Implementer; In charge of the activity's success	High	Positive	--	--	--

Stakeholder	Engagement or Role with respect to TFP (Level of centrality)	Influence toward TFP (High, Medium, Low)	Attitude toward TFP (Positive, Neutral, Negative)	Inhibiting factors/ Challenges	Motivating factors/ Opportunities	Strategies for engagement
Sub-Contractors	Implementer/Consultant in charge of part of TFP activities as contracted	High	Positive	--	--	--
Donor						
USAID/Vietnam	Donor	High	Positive	--	--	May need more in-depth stakeholder communications before program design; Help with sharing of international experts and best practices; Consider the lessons learned for future support

ANNEX V: VIETNAM TRADE FACILITATION SYSTEM IN OCTOBER 2021 (SIMPLIFIED)



ANNEX VI: DATA COLLECTION TOOLS

The following data collection tools are attached as separate documents that can be downloaded:⁷²

- [Online Survey](#)
- [KII Guide \(general version\)](#)
- [FGD Guides for TFP's effects on coordination](#)
- [FGD Guides for TFP's effects on private sector engagement](#)

⁷²

[https://socialimpact.sharepoint.com/:f/r/sites/ops/100100/Tech%20EXTERNAL/01_Activities_Learns%20Tasks/01%20DOI%20_%20Economic%20Competitiveness/DOI.1%20-%20Economic%20Growth/DOI.1%20_%20TFP/4.004%20TFP%20Midterm%20Evaluation/4.004%20TFP%20Midterm%20Evaluation%20\(Consultant%20Access\)/9.%20Report/Annex_VI_DataCollectionTools?csf=1&web=1&e=TnBRII](https://socialimpact.sharepoint.com/:f/r/sites/ops/100100/Tech%20EXTERNAL/01_Activities_Learns%20Tasks/01%20DOI%20_%20Economic%20Competitiveness/DOI.1%20-%20Economic%20Growth/DOI.1%20_%20TFP/4.004%20TFP%20Midterm%20Evaluation/4.004%20TFP%20Midterm%20Evaluation%20(Consultant%20Access)/9.%20Report/Annex_VI_DataCollectionTools?csf=1&web=1&e=TnBRII)

ANNEX VII: EVALUATION METHODS AND LIMITATIONS

Secondary sources: There were no challenges with secondary resources. The IP also provided all required documents.

Online survey: TFP provided the evaluation team with a list of 1,483 participants. There were challenges with approx. 400 participants who had invalid or no emails. The program had a higher number of participants for who no name or contact email was available.

Key informant interviews (KIIs): There were no in-person meetings. This may have limited the openness of key informants.

Focus group discussions (FGDs): FGDs partly oversized with overrepresentation of GDVC, and provincial customs. This may have caused private sector participants to be less frank.

The **consultation workshop** to validate initial findings had to be completely virtually. This may have affected the ability of participants to contribute which was tried to be solved through good facilitation.

The **utilization event and out-brief to USAID** could be held as hybrid meetings (in person & virtual) which may have affected the ability of virtual participants to share their feedback.

There are **challenges to attribute achievements to program, alone**, because of the strong reform efforts of the GVN and the inheritance from predecessor programs funded by USAID such as the Governance and Inclusive Growth (GIG) program.

ANNEX VIII: USAID TRADE FACILITATION PROGRAM MIDTERM EVALUATION STATEMENT OF WORK

Background

This Statement of Work (SOW) describes the conditions of work for an external midterm evaluation of the USAID-funded Trade Facilitation Program (TFP). Implemented by Nathan Associates Inc., TFP is a \$21.7 million, five-year contract from March 2018 – 2023.

The purpose of this evaluation is to provide an independent and in-depth assessment of the overall progress of TFP in Vietnam as well as examining the activity's design and progress in addressing Government of Vietnam (GVN)'s priorities and private sector's needs to expedite cross-border trade and enhance trade facilitation. The evaluation will also identify lessons learnt for implementation improvement and future design.

Overview of TFP

Activity Name	USAID Trade Facilitation Program (TFP)
Implementer	Nathan Associates Inc.
Contract #	Contract No. 72044018C00001
Total Estimated Ceiling of the Evaluated Activity (TEC)	\$21,785,532
Life of Activity	May 2018- May 2023
Active Geographic Regions	The activity is based in Hanoi and work in six targeted provinces: Hai Phong, Hanoi, Danang, Quang Tri, Ho Chi Minh City and Dong Nai TFP providing technical assistance to the General Department of Vietnam Customs (GDVC)
Country Development Cooperation Strategy (CDCS) Development Objective(s) (DOs)	Direct contribution to Intermediate Result (IR)1: Business enabling environment improved
USAID Office	USAID/Vietnam, Economic Growth and Governance Office

TFP is a five-year activity that aims to support the adoption and implementation of a risk-based approach to customs and “specialized inspection” institutions in Vietnam. Attaining this objective will facilitate the implementation of the World Trade Organization (WTO) Trade Facilitation Agreement. (TFA). The primary GVN counterpart for the TFP is the GDVC, which also acts as the focal point of the National Trade Facilitation Committee (NTFC) for Vietnam. Within this context, TFP supports national and provincial stakeholders in promoting the benefits to be gained by the application of a risk management approach to specialized inspections (SIs) mandated by line ministries to protect food safety, public health, and the environment. SIs are considered a major impediment to trade, causing major delays in border clearance. TFP specifically aims to strengthen the role and capacity of the NTFC to effectively implement and coordinate trade facilitation (TF) policies and procedures, and to promote more proactive public-private dialogue.

TFP comprises four different components:

- Component 1: Harmonization and simplification of key risk management and SIs-related policies at the central level and strengthening the role of the NTFC
- Component 2: Strengthening National-Provincial (Vertical) coordination of trade facilitation strategies and facilitating import and export of goods
- Component 3: Strengthening the provincial level implementation and inter-provincial coordination in at least five targeted provinces
- Component 4: Enhancing the partnership between customs and the private sector

In addition to providing targeted assistance at the central level, TFP has secured provincial buy-in by localizing technical assistance and operations in the six selected provinces (Hanoi, Hai Phong, Quang Tri, Da Nang, Ho Chi Minh City and Dong Nai). When implementing activities, TFP will look specifically to engage the private sector, the ultimate beneficiaries of trade facilitation, as advocates to customs procedures and trade facilitation reforms. Achieving the USAID Trade Facilitation Program objectives will help improve the trade and investment environment for Vietnamese and United States (U.S.) companies and help Vietnamese small and medium enterprises (SMEs) further integrate into global value chains.

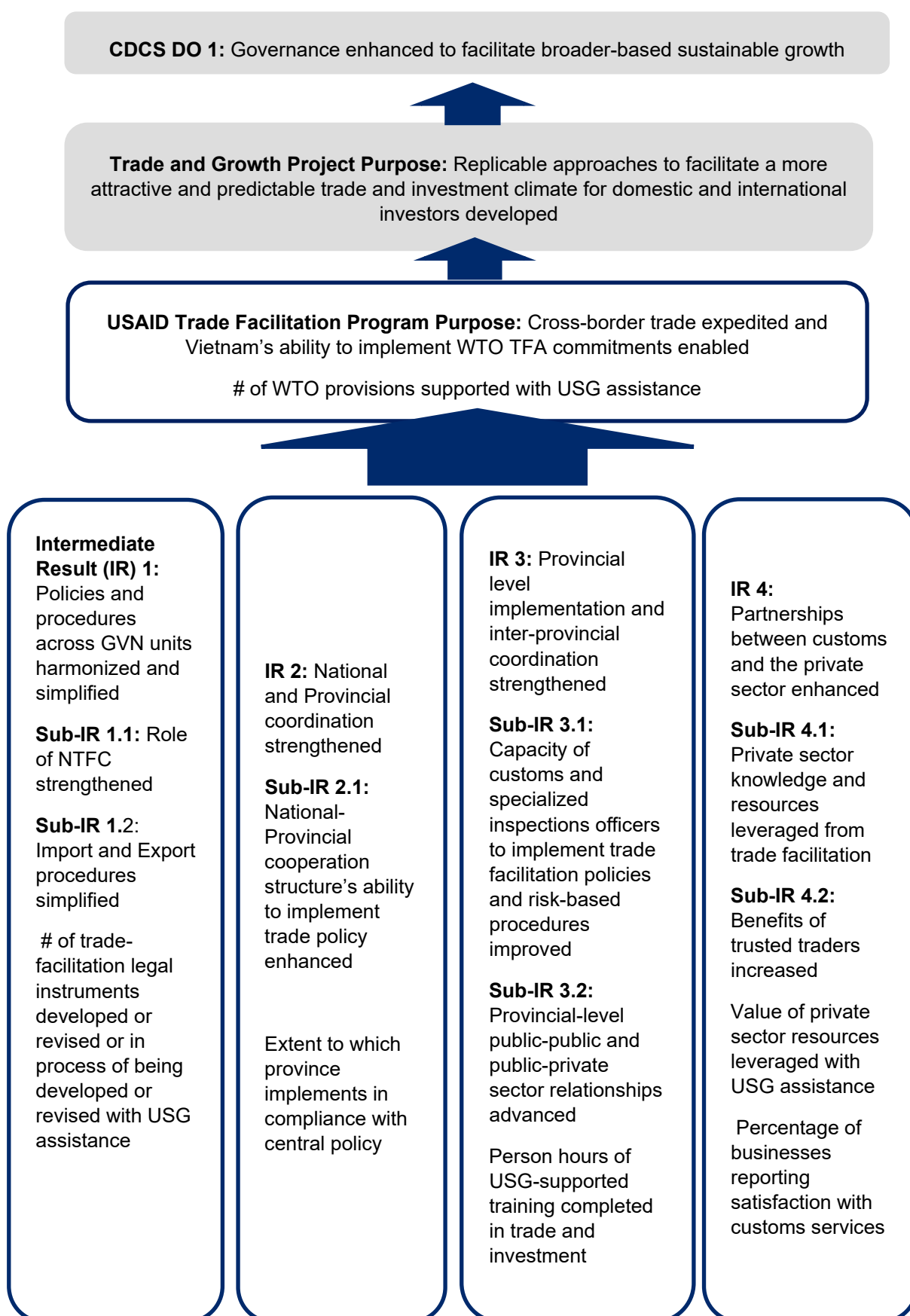
The program was approved by the Ministry of Finance (MOF) in July 2019 and is expected to operate through May 2023.

TFP TOC and Results Framework

The following is the activity's TOC, as defined in the TFP Monitoring and Evaluation Plan from May 2018.

If trade facilitation policies are simplified across GVN units; trade policies are harmonized between the national and provincial level; customs implementation is harmonized and professionalized at the provincial level; and customs management adopts modern, risk reducing approaches, **then** Vietnam presents a more attractive and predictable trade and investment climate for domestic SMEs and international global value chain (GVC) investors.

A graphic of the activity's Results Framework is presented below.



Purpose of Evaluation

To ensure that TFP's activities are strategically contributing to the goal in the most effective way, this midterm evaluation will examine the relevance of the activity's design and the performance of the implementation approach.

By measuring the effectiveness and sustainability of the intervention, the evaluation will identify early results and lessons learned from implementation and will provide succinct, actionable recommendations. The Mission will use the evaluation to guide midcourse correction for TFP and inform more strategic USAID investment in the sector in the future.

Evaluation findings and recommendations will be shared and discussed with the Mission, the IP, and other relevant partners.

Key audience:

1. Primary (1st audience) **internal USAID/USG** for new design support - COR, CO, EG, PRO, other technical offices, Front Office, and interlocutor support in DC, Interagency, at Post;
2. Secondary (2nd audience) - **IP** for learning around quality of programming, deliverables, and strategic contributions - essentially reflection and direction;
3. Tertiary (3rd audience) - Findings for **GVN counterparts** to open discussions on future planning, design, strategic adjustments, changes in counterparts, and early commitments to change of direction, focused on trade and investment opportunities.

Evaluation Questions

Question	To answer	Note
Q1. Progress toward Program Purpose: How well does the activity align with government (national and provincial) and private sector needs to expedite cross-border trade?	• To understand whether the activity is doing the “right” things for/with these stakeholder groups. • To examine the extent to which the activity can address GVN (national and provincial) priorities/needs to expedite cross-border trade. • To examine the extent to which the activity can address the private sector needs to expedite cross-border trade. • To identify the remaining priorities of GVN and the private sector that can be considered for future activities. • To understand potential factors constraining the private sector from involvement in policy development and whether there is a role for USAID to help alleviate or eliminate these constraints	Disaggregate findings by actor perspectives.
Q2. Progress toward IR 2 and 3: To what extent has the activity helped to improve inter-agency coordination at central and provincial levels and central-provincial	• To understand current structure and mechanisms of inter-agency coordination at central and provincial levels and central-provincial coordination. • To assess whether the activity has helped to improve inter-agency coordination at central	Disaggregate findings by actor perspectives.

Question	To answer	Note
coordination to expedite trade? What are the obstacles and opportunities for improvement, especially from the GVN point of view?	and provincial levels and central-provincial coordination to expedite trade. • If not, the question will explore the bottlenecks, the hindering factors, and the obstacles that prevent the activity from achieving the expected improvement. • The question will also provide information about enabling factors that contribute to the coordination if it has been improved. • The question may provide insight on the formal and informal rules that affect this structure and these mechanisms from working effectively.	
Q3. Drivers of Progress: What are the driving factors influencing or inhibiting progress to date, particularly in customs and trade facilitation systems?	• To assess which factors play the largest role in the progress (or lack of progress) in customs and trade facilitation systems, the evaluation will apply the 5Rs Framework, which highlights five key dimensions of systems: Results, Roles, Relationships, Rules and Resources. Collectively these 5Rs will serve as the lens for assessing these local systems. • To identify the most critical areas for future USAID attention in customs and trade facilitation • 5R Framework reference: https://usaidlearninglab.org/sites/default/files/resource/files/5rs_technical_note_ver_2_1_final.pdf	Disaggregate findings by actor perspectives. <i>Note: use the 5R framework to develop the question guide.</i>
Q4. Cross-cutting issue: To what extent has the activity been gender-responsive in its design and implementation?	• To understand whether gender issues were considered in the project design and implementation. • To examine whether the activity design and implementation are able to effectively ensure equitable access and opportunities to all genders.	<i>Note: use the 5R framework to develop the question guide.</i>
Q5. Lessons learned: What are the main lessons learned from TFP's successes and challenges related to trade facilitation?	• To identify lessons learned from the activity's successes to continue the good work and to share experience with GVN, other relevant stakeholders, and the future projects. • To identify lessons learned from the activity's challenges or limited results to provide recommendations as well as sharing experience with GVN, other relevant stakeholders, and to support future programming & activity design.	<i>Note: use the 5R framework to develop the question guide.</i> Disaggregate findings by actor perspectives.

Evaluation methods

The evaluation will employ a mixed methods approach using both quantitative and qualitative data collection and analysis. Data will be triangulated from different sources including secondary data from a desk review, available assessment studies, reports, and primary data collected from site visits.

The evaluation team will conduct a desk review of available literature including activity documents. The evaluation team will also look at sectoral assessments and other analysis that were used to determine interventions. Site visits will provide qualitative data for analysis through methods such as in-depth and key informant interviews (KIs), focus groups, and direct observation. The qualitative data collection can be supplemented by quantitative data collection through a mini survey if the evaluation team sees the need to quantify and measure the level of changes and progress that will be captured by qualitative data.

The evaluation team will also use secondary quantitative data provided by the IP in regular quarterly and annual reports, performance reporting, and assessments for most of the quantitative data required.

Geographically, the evaluation should sample implementation locations from North, Central, and South Vietnam.

The evaluation will apply the [5Rs Framework](#) to examine progress toward building local ownership by highlighting five key dimensions of systems: Results, Roles, Relationships, Rules and Resources. Collectively, the five dimensions will serve as the lens to examine EQ3, EQ4, and EQ5.

The USAID/Vietnam, Economic Growth and Governance Office team will provide documents for the desk review, as well as contact information for prospective interviewees. The evaluation team will be responsible for identifying and reviewing additional materials relevant to the evaluation, as well as additional contacts. Illustrative data sources include but are not limited to:

- Contract document and associated scope of work
- Analysis or research used to inform the design of TFP
- Activity Monitoring, Evaluation, and Learning Plan (AMELP)
- M&E Reports (both internal and external) (e.g., DQA reports, studies, assessments)
- Annual progress reports and workplans
- Any other TFP internal reports or summaries related to project implementation
- Relevant national/sector policies and plans from Vietnamese partners
- Relevant project documents from other donors in the trade area
- [Evaluation Policy](#), pages 7-11
- STAR Evaluation
- GIG [Evaluation](#)
- A list of Point of Contacts

Deliverables

- **Inception Report:** The evaluation team will submit to USAID an Inception Report that includes: (i) a detailed evaluation design matrix that links the Evaluation Questions in the SOW to data sources, methods, and the data analysis plan, (ii) draft questionnaires and other data collection instruments or their main features, (iii) the list of planned interviewees and sites to be visited and proposed selection criteria and/or sampling plan, (iv) and known limitations to the evaluation design.

- **In-brief presentation:** The purpose of the in-brief will be to discuss with USAID, IP, and GVN, if applicable, about the team's understanding of the assignment and review the evaluation design before launching primary data collection.
- **Validation workshop with USAID:** The key purpose of this workshop will be to present preliminary findings to ensure analysis is validated and fine-tuned by actors as well as informing user-driven report drafting. The validation workshop will also provide an opportunity for stakeholders to jointly develop user-owned recommendations. If deemed appropriate by USAID, IPs, GVN, and other stakeholders may participate in this workshop.
- **Out-brief:** The evaluation team will hold a final exit briefing with the Mission to discuss preliminary findings, outstanding issues, and recommendations.. This presentation will be scheduled as agreed upon during the in-briefing.
- **Draft Evaluation Report:** The draft evaluation report will address each of the questions identified in the SOW and any other issues the team considers having a bearing on the objectives of the evaluation. Once the initial draft evaluation report is submitted, USAID and IPs will have 10 business days in which to review and comment on the initial draft, after which point the AOR/COR will submit the consolidated comments to the evaluation team. See Annex I for detailed guidance on the Evaluation report.
- **Utilization Workshop:** The purpose of this workshop is for users to jointly agree on how to operationalize recommendations, collaborate, and follow-up on progress. The workshop will also offer additional guidance on report finalization.
- **Final Evaluation Report:** The evaluation team will be asked to take no more than 15 business days to respond/incorporate comments from USAID, IP, and GVN as applicable. USAID Learns will then submit the final report to the COR. USAID will review and approve the report within 10 business days of submission. If additional revisions are necessary, USAID will flag at this point.
 - The report will be submitted electronically. The final report will be edited/formatted to be 508 compliant and comply with the USAID Evaluation Policy. After final approval from USAID, the report will be published to the Development Experience Clearinghouse at <http://dec.usaid.gov> and relevant quantitative data submitted to the Data Development Library.

Team Composition

The core evaluation team will be composed of four individuals: a team leader, two technical experts, and an evaluation coordinator. Apart from trade facilitation, at least one team member will have customs expertise. In addition, Eleanor Thornton, a Senior International Trade Specialist from USAID/ Washington's Center for Economics and Market Development/Trade, will join the team as a technical advisor.

I. Team Leader

Responsibilities:

- Lead the development of the evaluation design including methodology, instruments, and workplan
- Perform desk review and identify additional information required for analysis
- Conduct and oversee the consultant team to conduct data collection for the evaluation
- Coordinate team's ongoing analysis of qualitative and quantitative data
- Lead the preparation and presentation of the evaluation design, key findings, and recommendations to USAID together with the evaluation team

- Write the draft evaluation report with support from the team members, taking into consideration feedback from presentations and consultation workshops
- Respond to comments on the draft report and prepare final report
- Work collaboratively with team members throughout design, implementation, analysis, and report writing to complement each other's areas of expertise

Qualifications:

- A senior professional with experience leading and conducting performance evaluations of trade policy, customs, and trade facilitation programs.
- At least ten years of experience related to management and analysis of trade, trade facilitation, customs modernization programs.
- An advanced degree in a discipline related to economics, trade, custom, or relevant fields
- Experience working with government officials and other stakeholders to support policy and institutional reform processes.
- Knowledge of USAID rules, regulations, and procedures is desirable.
- Experience working in Vietnam or similar programs in Southeast Asia.
- Excellent oral and written skills are required.

2. Senior Trade Facilitation Expert

Responsibilities:

- Perform desk review and identify additional information required for analysis
- Provide technical expertise and support the Team Lead's efforts in evaluation design, methodology, and data collection instruments.
- Schedule and interview key stakeholders and beneficiaries; conduct data collection as needed
- Provide ongoing analysis of qualitative and quantitative data
- Support the preparation and presentation of the key findings and recommendations to USAID
- Write assigned section of the draft evaluation report in coordination with the team members, taking into consideration feedback from the preliminary findings presentation
- Work collaboratively with team members throughout design, implementation, analysis, and report writing to complement each other's areas of expertise

Qualifications:

- Master's degree in a discipline related to trade, customs, public policy, international development, or other relevant fields
- At least 10 years of experience working with trade, trade facilitation, or customs modernization programs
- Preferred experience in risk-based management approaches for customs; experience supporting GVN capacity in this area a plus
- Experience supporting intra and intergovernmental coordination to expedite trade
- Must be able to conduct interviews and FGDs and analyze the resulting data
- Ability to work independently to meet deadlines and adhere to high quality standards
- Evaluation experience related to trade preferred
- Knowledge of the operating environment in Vietnam is preferred

3. Trade Facilitation Specialist

Responsibilities:

- Perform desk review and identify additional information required for analysis
- Provide technical expertise and support the Team Lead's efforts in evaluation design, methodology, and data collection instruments.
- Schedule and interview key stakeholders and beneficiaries; conduct data collection as needed
- Provide ongoing analysis of qualitative and quantitative data
- Support the preparation and presentation of the key findings and recommendations to USAID
- Write assigned section of the draft evaluation report in coordination with the team members, taking into consideration feedback from the preliminary findings presentation
- Work collaboratively with team members throughout design, implementation, analysis, and report writing to complement each other's areas of expertise

Qualifications:

- Master's degree in a discipline related to trade, customs, public policy, international development, or other relevant field
- Having knowledge on risk-based management approach and custom is a plus
- At least five years of experience working with trade, trade facilitation, or customs modernization programs
- Preferred expertise in risk-based management approaches for customs; experience supporting GVN capacity in this area a plus
- Ability to navigate and advise on inter-agency, central-provincial, and inter-provincial coordination to expedite trade
- Must be able to conduct interviews and focus group discussions and analyze the resulting data
- Ability to work independently to meet deadlines and adhere to high quality standards
- Evaluation experience related to trade preferred
- Fluency in Vietnamese and in-depth knowledge of the operating environment in Vietnam required
- The candidate must be Vietnamese and reside in Vietnam

4. Evaluation Coordinator

Responsibilities:

- Perform desk review and identify additional information required for analysis
- Support the Team Leader's lead efforts in evaluation design, methodology, and data collection instruments.
- Coordinate the evaluation activities, including meetings, interviews, notetaking
- Provide logistics support for evaluation activities, including interviews, meetings, group discussion, fieldwork, and events
- Conduct interviews as needed and contribute to data collection
- Provide ongoing analysis of qualitative and quantitative data
- Support the preparation and presentation of the key findings and recommendations to USAID

- Write assigned section of the draft evaluation report in coordination with the team members, taking into consideration feedback from the preliminary findings presentation
- Work collaboratively with team members throughout design, implementation, analysis, and report writing to complement each other's areas of expertise

Qualifications:

- Bachelor's degree, with preference for degree relevant to research, trade, custom, public policy, international development, or another related field
- 5 years of experience supporting or conducting mixed-method program evaluation or research
- Must be able to conduct interviews and FGD and analyze the resulting data
- Sound experience with administration and/or logistics for data collection, specifically coordinating data collection activities
- Demonstrated organizational skills, attention to detail, and ability to take detailed notes
- Ability to work independently to meet deadlines and adhere to high quality standards
- Monitoring and/or Evaluation experience related to trade preferred
- Social and gender analytical skills preferred
- Fluency in Vietnamese and in-depth knowledge of the operating environment in Vietnam required
- The candidate must be Vietnamese and reside in Vietnam

USAID Learns support: Technical support and direction will be provided by the USAID Learns Research Team and Social Impact headquarters staff. Logistical coordination and interpretation, as well as scheduling, will be managed by the USAID Learns Research Team in conjunction with USAID/Vietnam and Nathan Inc.

Deliverables and Estimated LoE for Consultant Team

Deliverable	Tentative Date	Internal/ External	LOE			
			TL	Expert	Specialist	Coordinator
Kick-off Meeting with USAID	30-Jun	External	2	2	2	1
Desk Review	7-Jul	Internal	7	2	2	1
Inception Report	14-Jul	Internal	8	2	2	1
Inbrief PPT	17-Jul	Internal	1	0.5	0.5	0.5
Inbrief with USAID	20-Jul	External	1	0.5	0.5	0.5
Final Inception Report Submitted	23-Jul	Internal/ External	1			
Inception Report Approved by USAID	30-Jul					
Data collection	1 Aug - 15 Aug	Internal	12	3	12	15
Preliminary Analysis Matrix 1	22-Aug	Internal	5	5	5	4
Preliminary Analysis Matrix 2	30-Aug	Internal	2	1	1	1
Validation Event agenda/content	5-Sep	Internal	1	0.5	0.5	0.5
Validation Event with USAID, IPs	7-Sep	External	1	0.5	0.5	0.5
Draft Report	20-Sep	Internal	10	5	5	3
Out-brief Meeting with USAID	30-Sep	External	1	0.5	0.5	0.5
Draft Report Submitted to USAID	10-Oct	External	2	2	1	1
USAID and IPs share feedback	17-Oct	External				
Utilization Event	25-Oct	External	1	0.5	0.5	0.5
Final Report	25-Oct	External	5	1	1	
Buffer LOE			5	5	5	5
TOTAL			65	31	40	35

ANNEX IX: DISCLOSURE OF ANY CONFLICTS OF INTEREST

Daniela Rink – Team Leader

Disclosure of Conflict of Interest for USAID Evaluation Team Members

Name	Daniela Rink
Title	Team Leader
Organization	Social Impact, Inc.
Evaluation Position?	☒ Team Leader ☐ Team member
Evaluation Award Number (contract or other instrument)	72044019C00003
USAID Project(s) Evaluated (Include project name(s), implementer name(s) and award number(s), if applicable)	Mid-term performance evaluation of the USAID Trade Facilitation Program (TFP)
I have real or potential conflicts of interest to disclose.	☐ Yes ☒ No
If yes answered above, I disclose the following facts: <i>Real or potential conflicts of interest may include, but are not limited to:</i> 1. Close family member who is an employee of the USAID operating unit managing the project(s) being evaluated or the implementing organization(s) whose project(s) are being evaluated. 2. Financial interest that is direct, or is significant though indirect, in the implementing organization(s) whose projects are being evaluated or in the outcome of the evaluation. 3. Current or previous direct or significant though indirect experience with the project(s) being evaluated, including involvement in the project design or previous iterations of the project. 4. Current or previous work experience or seeking employment with the USAID operating unit managing the evaluation or the implementing organization(s) whose project(s) are being evaluated. 5. Current or previous work experience with an organization that may be seen as an industry competitor with the implementing organization(s) whose project(s) are being evaluated. 6. Preconceived ideas toward individuals, groups, organizations, or objectives of the particular projects and organizations being evaluated that could bias the evaluation.	--

I certify (1) that I have completed this disclosure form fully and to the best of my ability and (2) that I will update this disclosure form promptly if relevant circumstances change. If I gain access to proprietary information of other companies, then I agree to protect their information from unauthorized use or disclosure for as long as it remains proprietary and refrain from using the information for any purpose other than that for which it was furnished.

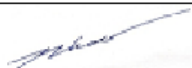
Signature	Daniela Rink	Digital unterschrieben von Daniela Rink Datum: 2021.08.12 18:22:49 +02'00'
Date	August 12, 2021	

Nhat Nguyen – Senior Trade Facilitation Expert

Disclosure of Conflict of Interest for USAID Evaluation Team Members

Name	Nhat Nguyen Duc
Title	Senior Trade Facilitation Expert
Organization	
Evaluation Position	☐ Team Leader ☐ y Team member
Evaluation Award Number (contract or other instrument)	
USAID Project(s) Evaluated (include project name(s), implementer name(s) and award number(s), if applicable)	USAID evaluation: TFP Mid-term evaluation
I have real or potential conflicts of interest to disclose.	☐ Yes ☒ No
If yes answered above, I disclose the following facts: <i>Real or potential conflicts of interest may include, but are not limited to:</i> 1. Close family member who is an employee of the USAID operating unit managing the project(s) being evaluated or the implementing organization(s) whose project(s) are being evaluated. 2. Financial interest that is direct, or is significant though indirect, in the implementing organization(s) whose projects are being evaluated or in the outcome of the evaluation. 3. Current or previous direct or significant though indirect experience with the project(s) being evaluated, including involvement in the project design or previous iterations of the project. 4. Current or previous work experience or seeking employment with the USAID operating unit managing the evaluation or the implementing organization(s) whose project(s) are being evaluated. 5. Current or previous work experience with an organization that may be seen as an industry competitor with the implementing organization(s) whose project(s) are being evaluated. 6. Preconceived ideas toward individuals, groups, organizations, or objectives of the particular projects and organizations being evaluated that could bias the evaluation.	

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Signature	 Nhat Nguyen Duc
Date	June 25th, 2021

Tram Bui – Trade Facilitation Specialist

Disclosure of Conflict of Interest for USAID Evaluation Team Members

Name	Bui Van Tram
Title	Trade Facilitation Specialist
Organization	USAID LEARNS/SOCIAL IMPACT, INC
Evaluation Position	☐ Team Leader ☒ Team member X
Evaluation Award Number (contract or other instrument)	
USAID Project(s) Evaluated (Include project name(s), implementer name(s) and award number(s), if applicable)	
I have real or potential conflicts of interest to disclose.	☐ Yes ☒ No
If yes answered above, I disclose the following facts: <i>Real or potential conflicts of interest may include, but are not limited to:</i> 1. Close family member who is an employee of the USAID operating unit managing the project(s) being evaluated or the implementing organization(s) whose project(s) are being evaluated. 2. Financial interest that is direct, or is significant though indirect, in the implementing organization(s) whose projects are being evaluated or in the outcome of the evaluation. 3. Current or previous direct or significant though indirect experience with the project(s) being evaluated, including involvement in the project design or previous iterations of the project. 4. Current or previous work experience or seeking employment with the USAID operating unit managing the evaluation or the implementing organization(s) whose project(s) are being evaluated. 5. Current or previous work experience with an organization that may be seen as an industry competitor with the implementing organization(s) whose project(s) are being evaluated. 6. Preconceived ideas toward individuals, groups, organizations, or objectives of the particular projects and organizations being evaluated that could bias the evaluation.	4. I had previously sought employment with the TFP Project Office executed by Nathan Inc, for the position of Regional Trade Facilitation Coordinator; however I was failed.

I certify (1) that I have completed this disclosure form fully and to the best of my ability and (2) that I will update this disclosure form promptly if relevant circumstances change. If I gain access to proprietary information of other companies, then I agree to protect their information from unauthorized use or disclosure for as long as it remains proprietary and refrain from using the information for any purpose other than that for which it was furnished.

Signature	Bui, Van Tram
Date	June 10, 2021

Thanh Nguyen – Evaluation Coordinator

Disclosure of Conflict of Interest for USAID Evaluation Team Members

Name	Thanh Nguyen Chan
Title	Evaluation Coordinator
Organization	Social Impact
Evaluation Position	☐ Team Leader ☒ Team member
Evaluation Award Number (contract or other instrument)	
USAID Project(s) Evaluated (Include project name(s), implementer name(s) and award number(s), if applicable)	TFP Mid-term Evaluation
I have real or potential conflicts of interest to disclose.	☐ Yes ☒ No
If yes answered above, I disclose the following facts: <i>Real or potential conflicts of interest may include, but are not limited to:</i> 1. Close family member who is an employee of the USAID operating unit managing the project(s) being evaluated or the implementing organization(s) whose project(s) are being evaluated. 2. Financial interest that is direct, or is significant though indirect, in the implementing organization(s) whose projects are being evaluated or in the outcome of the evaluation. 3. Current or previous direct or significant though indirect experience with the project(s) being evaluated, including involvement in the project design or previous iterations of the project. 4. Current or previous work experience or seeking employment with the USAID operating unit managing the evaluation or the implementing organization(s) whose project(s) are being evaluated. 5. Current or previous work experience with an organization that may be seen as an industry competitor with the implementing organization(s) whose project(s) are being evaluated. 6. Preconceived ideas toward individuals, groups, organizations, or objectives of the particular projects and organizations being evaluated that could bias the evaluation.	

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Signature	
Date	10 June 2021

ANNEX X: POST-EVALUATION ACTION PLAN

Date: Wednesday, December 08, 2021

Participants: TFP and USAID/Vietnam

Recommendation	What needs to be done?	By whom?	When?	Status	Budget (if applicable)
Recommendation I - Strengthen NTFC's Function				TFP team agrees with the recommendation In TFP Y4WP	
	Support activating a working level network among NTFC's member ministries	TFP in collaboration with GDVC: will need support from NTFC leadership and line ministries	At next NTFC meeting (tentatively Dec. 2021)	Depends on the willingness of GVN Agreed with Standing Office of NTFC (ITSC) to introduce the NTFC report into the next NTFC meeting	No budget required
	Support activating a working level network between line ministries and private sector	TFP in collaboration with VCCI and might consider to have discussion with VLA to have a separate action with them		TFP planned with VCCI to promote this kind of action; TFP considers discussion with VBF	

Recommendation	What needs to be done?	By whom?	When?	Status	Budget (if applicable)
	Provide evidence-based messages to NTFC	Requires support by GDVC One of main functions of VCCI under the agreement with TFP is to present recommendations from TFP to NTFC	Upcoming year	TFP to negotiate the implementation with GDVC, including communication with the NTFC chairman and its members; requiring some support from GDVC	
	Support VCCI's role in leveraging the voice of the private sector	Part of agreement with VCCI Standing committee of NTFC (ITCS)		In TFP Y4WP Part of the plan between VCCI and TFP; ongoing work plan to cooperate with VBF TFP is currently prepares agreement with VBF TFP worked with ITSC to strengthen their capacities (ITSC prepared reports for NTFC meetings)	

Recommendation	What needs to be done?	By whom?	When?	Status	Budget (if applicable)
	Continue support for better usability of NSW • Upgrade IT system, although IT system development and NSW will be separate • Provide guidance on how to monitor the implementation of the IT system Focus on one thing and do it well	TFP	Expected to complete by April-May 2022	TFP is developing the guidance on the Draft Decree on information sharing on the NSW The 1st Draft Decree on Information Sharing has been shared with provincial customs offices within GDVC. TFP to conduct the NSW satisfaction survey	
Recommendation 2 - Promote Provincial Trade Facilitation				TFP team agrees with the recommendation	
	Address provincial trade facilitation priorities (bottom-up): • Focus on effective implementation of local trade facilitation initiatives • Provide training to state agencies and the private sector on general risk management • Take advantage of existing social network groups/working groups between local customs and import-export companies			RM training is on TFP plan already TFP conducted RM studies in the first year but did not draw the interest of GDVC. Recently, GDVC has looked at TFP's Study for the new decree on RM for SI Waiting for approval of SI Decree	

Recommendation	What needs to be done?	By whom?	When?	Status	Budget (if applicable)
				Idea to cooperate with VBF and CIEM to advocate for the SI Decree.	
	Strengthen provincial trade facilitation mechanisms: - Assist the provincial trade facilitation mechanisms to activate a working level network - Get the private sector involved in the provincial trade facilitation mechanism - Assist the provincial trade facilitation mechanisms	TFP with VCCI assistance		Partly addressed Part of the agreement with VCCI for the private sector at local level; Devise communication strategy for PTFCs TFP need to work more on working plans to assist the provincial trade facilitation mechanisms	
Recommendation 3 - Further Harmonize Procedures and Strengthen Compliance				TFP team agrees with the recommendation	
	Train and develop capacity of other line Ministries: Introduce principle of risk management in laws			TFP team agrees with the recommendation	

Recommendation	What needs to be done?	By whom?	When?	Status	Budget (if applicable)
	Train on general risk management for more compliance to promote the risk-based approach to the regulatory framework on compliance and provide training to private sector to promote compliance: • Giving more training to private sector • As GDVD recommends this point to engage various stakeholders in training of general risk management, and to have more risk management principles in their legal documents, it could be better for program to provide training on RM principles under the regulations.			In TFP Y4WP	
Recommendation 4 - Enhance Partnerships Between Customs and Private Sector				TFP team agrees with the recommendation	
	Expand partnerships: • Part of general cooperation with VCCI; might consider internally to work with more associations				
	Assist ministries to communicate to businesses				

Recommendation	What needs to be done?	By whom?	When?	Status	Budget (if applicable)
	Develop capacities of business associations: Awareness raising activities of trader-/broker-/other associations			In TFP Y4WP	
	Share good practices of self-compliance: - Improve voluntary compliance; work with customs to do the delivery these good practices in self-compliance, risk management, etc.; and share international good practices/case studies of how private sector complies - This is part of GDVC request.	TFP team might start at the local level first.		Depends on whether private sector companies want to share their good practices Idea to work with brokers	
Recommendation 5 - Strengthen Gender Responsiveness				TFP team agrees with the recommendation	
	Adapt a more gender-responsive approach in the remaining annual work plans	TFP			
	Conduct diagnosis: - Get data from online-survey, do deep dive on why female participants gave lower ratings and talk to them	The evaluation team will provide the monkey survey data so that the TFP team can do further diagnosis.	When the report is finalized.		

Recommendation	What needs to be done?	By whom?	When?	Status	Budget (if applicable)
	Design gender-responsive trainings/events: • Though TFP training sessions are technical on the topics, different gender-based needs should be considered. Before training/event, it is necessary to reach out different gender groups and see what the needs are • Trainers should be asked to design and apply contents and training methods that are tailor-made to needs of each participant group • TFP should include gender responsiveness as a criterion when selecting and managing trainers/facilitators of each training session and/or consultation workshops.	TFP	In any training/event to be held after the midterm evaluation	Gender data are only collected and analyzed after training/events.	
	Deepen the use of sex-disaggregated data: • Gender data should be collected and analyzed based on sectors, levels of participants or any other appropriate criteria, and any gap be informed to decision makers.	TFP training/event organizers and M&E Specialist	In any training/event to be held after the midterm evaluation	Gender data are now only disaggregated between all males and females	

Recommendation	What needs to be done?	By whom?	When?	Status	Budget (if applicable)
	Cooperate with women-led business associations: Consider the possibility of working with some women led business associations such as VAWWE, VAAWE, VWU, women entrepreneur clubs; or with business associations of sectors extensively using female laborers to help improve benefits of women led businesses and/or female laborers Under VCCI there is a Women Entrepreneur's Council which may already have gender related activities with other donors. TFP needs to dig in how TFP could make a difference working with them.	TFP leaders and officers	From now until the end of TFP	There have been some engagements with business associations of sectors that use female laborers extensively (garments and textiles, leather and shoes, aquatic products) but nothing concrete has been done.	
	Analyze gender data and communicate gender-related lessons from the 2021 CBSS and other research to relevant stakeholders Work with VCCI to have gender data of the 2021 CSS collected and analyzed, based on which draw and compile lessons. The same should be applied to other TFP research where possible. And it is even more important to communicate these lessons in writing to relevant stakeholders.	TFP in cooperation with VCCI and any other consultants working on TFP funded research	From now until the end of TFP	VCCI is working on data of the 2021 CSS	

United States Agency for International Development
Hanoi, Vietnam

