

# Enhancing water security, biodiversity and resilience of livelihoods through integrated water resources management and ecosystem restoration in Viet Nam's Red River basin

Review CEO Endorsement and Make a recommendation

## Basic project information

**GEF ID**

11131

**Countries**

Viet Nam

**Project Name**

Enhancing water security, biodiversity and resilience of livelihoods through integrated water resources management and ecosystem restoration in Viet Nam's Red River basin

**Agencies**

FAO

**Date received by PM**

6/26/2024

**Review completed by PM**

7/18/2024

**Program Manager**

Ulrich Apel

**Focal Area**

Multi Focal Area

**Project Type**

FSP

## CEO

### Part I - General Project Information

1. a) Is the Project Information table correctly filled, including specifying adequate executing partners?

Secretariat comment at CEO Endorsement Request

07/02/2024: Yes.

Agency Response

b) Are the Rio Markers for CCM, CCA, BD and LD correctly selected, if applicable?

Secretariat comment at CEO Endorsement Request

07/02/2024: Not fully.

- Based on project design and financing tables the project has a principle BD objective, please revise.

11/05/2024: Addressed.

Cleared

Agency Response Thank you. This is revised to a Principal Objective.

2. Project Summary.

a) Does the project summary concisely describe the problem to be addressed, the project objective and the strategies to deliver the GEBs or adaptation benefits and other key expected outcomes?

b) Does the summary capture the essence of the project and is it within the max. of 250 words?

c) [If a child project under a program] Does the project summary include adequate and substantive link with the parent program goal and approach?

Secretariat comment at CEO Endorsement Request

07/02/2024: Not fully.

- Please note that this document is public will be circulated to a wide audience for comments/review. Please refrain from using abbreviations, such as ER, ES, PFD. Instead of "PFD": spell out the name of the program.

11/05/2024: Addressed.

Cleared

Agency ResponseThe abbreviations are replaced. Thank you.

**3. Project Description Overview**

- a) Is the project objective statement concise, clear and measurable?
- b) [If a child project under a program] Is there a project Theory of Change that is aligned and consistent with the overall program goal and approach?
- c) Are the components, outcomes, and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?
- d) Are gender dimensions, knowledge management, and M&E included within the project components and budgeted for?
- e) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?
- f) Is the PMC equal to or below 10% (for MSP) or 5% (for FSP)? If above, is the justification acceptable?

Secretariat comment at CEO Endorsement Request

07/02/2024: Please address the following:

b) Please clearly explain the Theory of Change for this project in a simple narrative format highlighting the causal pathways and what the project proponents expect to happen as a result of the planned project activities and why. This should then be the basis for M&E and adaptive management. Further the TOC graphic is overly complicated and illegible in the Portal interface. Please revise and resubmit.

e) GEF Project Financing and Co-Financing contributions to PMC are not proportional. Please amend.

08/15/2024:

- There seems to be some formatting issues in the Child Project Description Overview table and some information is not visible due to overlapping columns. Please review and only include the text.

11/05/2024: Addressed.

Cleared

## Agency Response

b) Many thanks, we expanded the narrative of the TOC to highlight the causal pathways. We have also replaced the TOC with a less wordy version, which allows for a larger font size, yet maintaining the GEF standard structure.

e) The Co-financing contribution to PMC is revised to proportionate with GEF Project Financing.

- Re: Formatting, Child Project Description Overview: Thank you. The correct format is uploaded.

## 4. Project Outline

### A. Project Rationale

- a) Is the current situation (including global environmental problems, key drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective and adequately addressed by the project design?
- b) Have the role of stakeholders, incl. the private sector and local actors in the system been described and how they will contribute to GEBs and/or adaptation benefits and other project outcomes? Is the private sector seen mainly as a stakeholder or as financier?
- c) If this is an NGI project, is there a description of how the project and its financial structure are addressing financial barriers?

Secretariat comment at CEO Endorsement Request

07/02/2024: Yes.

## Agency Response

## 5 B. Project Description

- 5.1 a) Is there a concise theory of change (narrative and an optional schematic) that describes the project logic, including how the project design elements are contributing to the objective, the identified causal pathways, the focus and basis (including scientific) of the proposed solutions, how they provide a robust approach? Are underlying key assumptions listed?
- b) [If a child project under a program] Is the Theory of change aligned with and consistent with the overall program goal and approach?
- c) Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region? [If a child project under a program] Does the description include how the alternative aligns with and contributes to the overall program goal and approach?
- d) Are the project components (interventions and activities) described and proposed solutions and critical assumptions and risks properly justified? Is there an indication of why the project approach has been selected over other potential options?
- e) Incremental/additional cost reasoning: Is the incremental/additional cost reasoning properly described

as per the Guidelines provided in GEF/C.31/12? Has the baseline scenario and/or associated baseline projects been described? Is the project incremental reasoning provisioned (including the role of the GEF)? Are the global environmental benefits and/or adaptation benefits identified?

f) Other Benefits: Are the socioeconomic benefits resulting from the project at the national and local levels sufficiently described?

g) Is the financing presented in the annexed financing table adequate and demonstrate a cost-effective approach to meet the project objectives? Are items charged to the PMC reasonable according to the GEF guidelines?

h) How does the project design ensure resilience to future changes in the drivers and adaptive management needs and options (as applicable for this FSP/MSP)?

i) Are the relevant stakeholders (including women, private sector, CSO, e.g.) and their roles adequately described within the components?

j) Gender: Does the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities and have these been taken up in component design and description/s?

k) Are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?

l) Policy Coherence: Have any policies, regulations or subsidies been identified that could counteract the intended project outcomes and how will that be addressed?

m) Transformation and/or innovation: Is the project going to be transformative or innovative? [If a child project under an integrated program] Are the specific levers of transformation identified and described? Does it explain scaling up opportunities?

Secretariat comment at CEO Endorsement Request

07/02/2024: Not fully.

- Please clearly explain the Theory of Change for this project in a simple narrative format highlighting the causal pathways and what the project proponents expect to happen as a result of the planned project activities and why. This should then be the basis for M&E and adaptive management. Further the TOC graphic is overly complicated and illegible in the Portal interface. Please revise and resubmit.

- In particular, the project description, including the ToC, should better explain on how "the ecosystem-focused increment will lead to substantially improved efficacy for flood and drought management while improving biodiversity values and livelihood (diversification) strategies across the Red River basin." As currently presented, ecosystem restoration comes across as an add-on to the improved water management; however, it should be presented as the core nature based solution, that the project will apply to achieve this objective.

- Please clearly explain the GEBs expected, in alignment with a revised TOC. Further, the GEB section refers to GEBs that will be "confirmed at PPG stage" whereas this is a CEO endorsement request, please revise/update.

11/05/2024: Addressed.

Cleared

## Agency Response

- We edited the narrative for the TOC diagram, placing Outputs, Barriers, and assumptions in the context of the four causal pathways. We also simplified the diagram for improved readability.
- Added text explaining how bottom-up and top-down activities afford solutions and establishing the institutional support for realising ecosystem restoration potentials.
- Added project description explaining how the management of land and water is connected to ecosystem restoration outcomes. Water management is a means to restore targeted ecosystems where their current and future health and functioning flows depend heavily on improved water management. To build sustainability and ownership, ecosystem restoration mechanisms must also improve livelihoods?hence the focus on designing incentive mechanisms with communities.
- We also added to the GEB-focused section direct references to the pathways of the TOC.

### **5.2 Institutional Arrangements and Coordination with Ongoing Initiatives and Project**

- a) Are the institutional arrangements, including potential executing partners, outlined on regional, national/local levels and a rationale provided? Has an organogram and/or funds flow diagram been included?**
- b) Comment on proposed agency execution support (if agency expects to request exception). Is GEF in support of the request?**
- c) Is there a description of coordination and cooperation with ongoing GEF and non-GEF financed projects/programs (such as government and/or other bilateral/multilateral supported initiatives in the project area, e.g.).**
- d) [If a child project under an integrated program] Does the framework for coordination and collaboration demonstrate consistency with overall ambition of the program for transformative change?**

## Secretariat comment at CEO Endorsement Request

07/02/2024: Not fully.

- a) yes, however, based on below comment (b), the organogram will need to be revised.
- b) Program Manager does not support the dual execution request. The justification is not considered adequate. The risk assessment indicates high institutional capacity and experience of the partner in executing such type of projects, therefore, a technical execution support is not justified. Further, the HACT indicates a low fiduciary risk. Please revise the institutional arrangements of the project and revise the budget accordingly.
- d) While coordination with the parent program is described under component 3, please elaborate on which specific topics/ transformation themes the project plans to jointly work / exchange on with other projects under program. Please also make sure that the budget earmarks resources to enable this type of cooperation / exchange.

11/05/2024: Addressed.

Cleared

### Agency Response

- MONRE's Department of Water Resources Management (DWRM), the lead Execution Agency of the project, has requested support following a thorough assessment of the technical capacity of operational partners. This support, which constitutes less than 2.7 percent of the total project budget, is crucial to address governmental challenges in international recruitment and to ensure the timely onboarding of an international lead technical specialist for project implementation. DWRM will oversee the technical contributions and remain in a leadership position for the entire project, while FAO will assist in identifying and transferring the best international technical capacity support to DWRM. Please refer to the attached support letter for further details, and we are available for additional discussions if required.

- The coordination with GCP is further elaborated under Component 1, 3 and 4 (page 19-20)

### 5.3 Core indicators

**a) Are the identified core indicators calculated using the methodology and adhering to the overarching principles included in the corresponding Guidelines (GEF/C.62/Inf.12/Rev.01)? [If a child project under a program] Is the choice of core indicators consistent with those prioritized under the parent program?**

**b) Are the project's targeted contributions to GEBs (measured through core indicators and additional listed outcome indicators) /adaptation benefits reasonable and achievable? Are the GEF Climate Change adaptation indicators and sub-indicators for LDCF and SCCF properly documented?**

### Secretariat comment at CEO Endorsement Request

07/02/2024: Not fully.

- The Core Indicator table should contain targets at "concept/PIF" stage and at "CEO endorsement stage". Currently there are only targets under the PIF column, please insert them. Further, should there be significant changes from the core indicator targets presented at PIF/concept compared to CEO endorsement stage, these should be explained.

- Provided that the project has a principal focus on BD, the targets do not fully reflect that. There is a high target under 4.3, but none under 4.1. Please clarify/address.

- While the text refers several time to "forest and wetland restoration", there are no targets for wetlands in the table. Please clarify.

- Annex O of the project document includes a screen shot of the main results page of the Ex-Act Tool, which matched the information under the Core Indicator section. Kindly provide the Ex-Act spreadsheet so we can track the calculations.

- text under section 'B. Child Project Description' includes the following: 'These activities will avoid further forest loss and reverse 20% of the losses made since 2020 by restoring forest and wetland ecosystems, which will accumulate to at least 900,000 t of CO<sub>2</sub>e emissions'. Further below reference is made to "increase of annual carbon mitigation of 10 million tons" Both figures is inconsistent with the CO<sub>2</sub> value of the Ex-Act Tool, i.e., 6,553,494 tCO<sub>2</sub> eq. Please address.

08/15/2024:

- Please provide the WDPA ID under core indicator 1.

11/05/2024: Addressed.

Cleared

#### Agency Response

- The Core indicators at concept stage are included in the revised prodoc (page 30).
- The project's Core Indicator 4 targets 700,000 hectares. Currently, we estimated 500,000 ha to benefit biodiversity (4.1: Area of landscapes under improved management to benefit biodiversity) while 200,000 ha are mapped against 4.3 (Area of landscapes under sustainable land management in production systems).
- We estimated 10,000 ha under indicator 3.4, which is the area for wetlands.
- Thank you for pointing out the inconsistencies. We revised the values to match the EX-ACT calculations. The EX-Act calculation spreadsheet is attached.
- The WDPA IDs are added to the Core Indicator 1.

#### 5.4 Risks

- a) Is there a well-articulated assessment of risk to outcomes and identification of mitigation measures under each relevant risk category? Are mitigation measures clearly identified and realistic? Is there any omission?
- b) Is the rating provided reflecting the residual risk to the likely achievement of intended outcomes after accounting for the expected implementation of mitigation measures?
- c) Are environmental and social risks, impacts and management measures adequately assessed and rated and consistent with requirements set out in SD/PL/03?

Secretariat comment at CEO Endorsement Request 07/02/2024: Yes.

#### Agency Response

**5.5 For NGI Only: Is there a justification of the financial structure and of the use of financial instrument with concessionality levels?**



Secretariat comment at CEO Endorsement Requestn/a

Agency Response

**6 C. Alignment with GEF-8 Programming Strategies and Country/Regional Priorities**

**6.1 a) Is the project adequately aligned with Focal Area objectives, and/or the LDCF/SCCF strategy?**

**b) [If a child project under an integrated program] Is the project adequately aligned with the program objective in the GEF-8 programming directions?**

Secretariat comment at CEO Endorsement Request

07/02/2024: Not fully.

While noting that child projects under the Integrated Program are integrating all three focal area objectives (BD, CC, LD), the project has clearly a focus on biodiversity objectives, given the context of the project area with its high global biodiversity value. Therefore, the alignment with BD objectives and targets should be improved.

11/05/2024: Addressed.

Cleared

Agency ResponseThanks for your suggestion. We had aimed for a balance between focal area objectives. However, we strengthened the alignment with biodiversity objectives, as suggested.

**6.2 Is the project alignment/coherent with country and regional priorities, policies, strategies and plans (including those related to the MEAs and to relevant sectors).**

Secretariat comment at CEO Endorsement Request07/02/2024: Yes.

Agency Response

**6.3 For projects aiming to generate biodiversity benefits (regardless of what the source of the resources is - i.e., BD, CC or LD), does the project clearly identify which of the 23 targets of the Kunming-Montreal Global Biodiversity Framework the project contributes to and how it contributes to the identified target(s)?**

Secretariat comment at CEO Endorsement Request07/02/2024: Yes.

Agency Response

**7 D. Policy Requirements**

**7.1 Are the Policy Requirement sections completed?**

Secretariat comment at CEO Endorsement Request07/02/2024: Yes.

## Agency Response

### **7.2 Is the Gender Action Plan uploaded?**

#### Secretariat comment at CEO Endorsement Request

07/02/2024: Yes, as part of the project document.

08/15/2024:

- The gender analysis and action plan is very detailed and informative. Please reflect in the Project Overview table, relevant gender dimensions in each component. Under Output 3.2.3, please ensure that communications and awareness strategy are gender-responsive and that knowledge products highlight the project's gender dimensions, best practices and lessons learned. Under Component 4, please ensure that gender-related results are monitored and reported on, and the GAP is budgeted.

11/05/2024: Addressed.

Cleared

Agency Response Many thanks for pointing out these gaps. We added gender to a range of Output descriptions, reflecting the key essence of the gender-focused version of the RF found in Annex K. We also changed Annex E accordingly to maintain consistency throughout the ProDoc. These changes reflect your suggestions for Output 3.2.3 and for Component 4, and also for most Outputs under Components 1 and 2 to improve gender empowerment and mainstreaming of gender in the description of the Outputs.

### **7.3 Is the stakeholder engagement plan uploaded?**

#### Secretariat comment at CEO Endorsement Request

07/02/2024: Yes, as part of the project document.

08/15/2024:

It is well noted that the project document includes a stakeholder engagement plan. Please provide further details on indicative resource allocations and name key project stakeholders planned to be engaged in project implementation, including local NGOs/CSOs, farmers associations, SMEs and local communities. Also, please provide any stakeholder analysis and summary of stakeholder consultation in project development.

11/05/2024: Addressed.

Cleared

## Agency Response

- The project will allocate an indicative budget of \$440,000 for stakeholder engagement at all levels (national, provincial and community level), mainly through consultation workshops and meetings, community consultation processes.
- Annex J provides names of key government stakeholders to be engaged in the project implementation. Annex J also provides a summary of stakeholder consultations over project development.
- It should be noted that the selection of local NGOs/ CSO farmers associations, SMEs and local communities, etc., will require competitive procurement processes, as such these stakeholders are yet identified by name in project development.

#### **7.4 Have the required applicable safeguards documents been uploaded?**

Secretariat comment at CEO Endorsement Request

07/02/2024: Yes, as part of the project document.

08/15/2024:

- It is well noted that ESMF rating (moderate) is uploaded. The ESIA and IP plan incorporated in annex ?ESS Supporting document 1b? however does not open. Please verify and re-upload as needed.

11/05/2024: Addressed.

Cleared

Agency ResponseThe ESS Supporting document 1b is re-uploaded.

#### **8 Annexes**

##### **Annex A: Financing Tables**

**8.1 GEF Financing Table and Focal Area Elements: Is the proposed GEF financing (including the Agency fee) in line with GEF policies and guidelines? Are they within the resources available from (mark all that apply):**

**STAR allocation?**

Secretariat comment at CEO Endorsement Request

07/02/2024: Yes.

Agency Response

**Focal Area allocation?**

Secretariat comment at CEO Endorsement Request07/02/2024: Yes.

Agency Response

**LDCF under the principle of equitable access?**

Secretariat comment at CEO Endorsement Requestn/a

Agency Response

**SCCF A (SIDS)?**

Secretariat comment at CEO Endorsement Requestn/a

Agency Response

**SCCF B (Tech Transfer, Innovation, Private Sector)?**

Secretariat comment at CEO Endorsement Requestn/a

Agency Response

**Focal Area Set Aside?**

Secretariat comment at CEO Endorsement Requestn/a

Agency Response

**8.2 Project Preparation Grant (PPG)**

**a) Is the use of PPG attached in Annex: Status of Utilization of Project Preparation Grant (PPG) properly itemized according to the guidelines?**

Secretariat comment at CEO Endorsement Request07/02/2024: Yes.

Agency Response

**8.3 Source of Funds**

**Does the sources of funds table match with the amounts in the OFP's LOE?**

**Note: the table only captures sources of funds from the country's STAR allocation**

Secretariat comment at CEO Endorsement Request07/02/2024: Yes.

Agency Response

**8.4 Confirmed co-financing for the project, by name and type: Are the amounts, sources, and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines?**

**e.g. Have letters of co-finance been submitted, correctly classified as investment mobilized or in-**

kind/recurring expenditures? If investment mobilized: is there an explanation below the table to describe the nature of co-finance? If letters are not in English, is a translation provided?

Secretariat comment at CEO Endorsement Request07/02/2024: Yes.

#### Agency Response

##### **Annex B: Endorsements**

**8.5 a) If ? and only if - this is a global or regional project for which not all country-based interventions were known at PIF stage and, therefore, not all LOEs provided:**

**Has the project been endorsed by the GEF OFP/s of all GEF eligible participating countries and has the OFP name and position been checked against the GEF database at the time of submission?**

Secretariat comment at CEO Endorsement Request07/02/2024: Yes.

#### Agency Response

**b) Are the OFP endorsement letters uploaded to the GEF Portal (compiled as a single document, if applicable)?**

Secretariat comment at CEO Endorsement Request07/02/2024: Yes.

#### Agency Response

**c) Do the letters follow the correct format and are the endorsed amounts consistent with the amounts included in the Portal?**

Secretariat comment at CEO Endorsement Request07/02/2024: Yes.

#### Agency Response

##### **Annex C: Project Results Framework**

**8.6 a) Have the GEF core indicators been included?**

**b) Have SMART indicators been used; are means of verification well thought out; do the targets correspond/are appropriate in view of total project financing (too high? Too low?)**

**c) Are all relevant indicators sex disaggregated?**

**d) Is the Project Results Framework included in the Project Document pasted in the Template?**

**e)[If a regional/global coordination child project under an integrated program] Does the results framework reflect the program-wide result framework, inclusive of results from child projects and specific to the regional/global coordination child project? [If a country child project under an integrated program] Is the child project result framework inclusive of program-wide metrics monitored across child project by the Regional/Global Child project?**

Secretariat comment at CEO Endorsement Request  
07/02/2024:

- please include GEF core indicators as appropriate.

11/05/2024: Addressed.

Cleared

Agency Response Thanks. GEF core indicators are included, as requested.

**Annex E: Project map and coordinates**

**8.7 Have geographic coordinates of project locations been entered in the dedicated table? Are relevant illustrative maps included?**

Secretariat comment at CEO Endorsement Request 07/02/2024: Yes.

Agency Response

**Annex F: Environmental and Social Safeguards Documentation and Rating**

**8.8 Have the relevant safeguard documents been uploaded to the GEF Portal? Has the safeguards rating been provided and filled out in the ER field below the risk table?**

Secretariat comment at CEO Endorsement Request 07/02/2024: Yes.

Agency Response

**Annex G: GEF Budget template**

**8.9 a) Is the GEF budget template attached and appropriately filled out incl. items such as the executing partner for each budget line?**

**b) Are the activities / expenditures reasonably and accurately charged to the three identified sources (Components, M&E and PMC)?**

**c) Are TORs for key project staff funded by GEF grant and/or co-finance attached?**

Secretariat comment at CEO Endorsement Request

07/02/2024: No.

- Please note that the budget has not been reviewed in by the financial team as it is not legible in the print version of portal. It will be reviewed in detail when re-submitted. However, some general comments are provided below.

- Please upload in a way that the print version is legible. The print version (which will be circulated to Council and other stakeholders), does not need to contain information on sub-components or break-down by implementation years.

- Please adjust budget reflecting national execution.

- Please clarify: There are several budget lines that indicate "contract". Which institutions are envisaged to enter into contractual arrangements?

- Please ensure sufficient budget availability for participation in global activities under the program.

08/15/2024:

- Chief Technical Advisor (CTA) and a National Coordinator are being charged across components. Per Guidelines, the costs associated with the project's execution have to be covered by the GEF portion and the co-financing portion allocated to PMC.

- In this context, please note that as per common practice currently applied for dual execution requests, we do not consider technical execution support justified in countries with overall good capacity. Please explore the use of co-financing for the position of the CTA.

11/05/2024: Addressed.

Cleared

#### Agency Response

- The budget format is revised as per the suggestion to ensure the print version is legible.

- Budget lines under the Contract category will be implemented through the procurement process in compliance with the Government Law on Tender and other relevant regulations. As such, no institutions are envisaged at this stage.

A dedicated budget line was included to cover for the participation in the global activities

#### **Annex H: NGI Relevant Annexes**

**8.10 a) Does the project provide sufficient detail (indicative term sheet) to assess the following criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments.**

**b) Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments.**

**c) Is the Agency eligible to administer concessional finance? If not, please provide comments.**

Secretariat comment at CEO Endorsement Requestn/a

#### Agency Response

#### **Additional Annexes**

#### **9. GEFSEC DECISION**

### **9.1.GEFSEC Recommendation**

#### **Is the project recommended for approval**

##### **Secretariat comment at CEO Endorsement Request**

07/02/2024: No. Please address comments made in this review.

Please note that due to the issues with the legibility of the ToC diagram and budget table, the review is only partially completed. A consolidated review will be provided upon the re-submission.

08/15/2024: No. While the documentation is now complete, there are some outstanding issues:

1) Please insert responses to comments made in the review sheet of 07/02/2024 into the agency response boxes under each comment. Please note that this is common practice in all GEF project reviews. Not providing responses in the response boxes causes considerable delays in the review as it is very difficult for the reviewer to track responses to comments provided.

2) Please address additional comments made in the review dated 08/15/2024. Please also respond to the comments in the agency response box under each comment.

3) Please resubmit a final version without yellow highlights in the text.

09/20/2024: No. The reviewer could not find any changes in the re-submission, there were no new documents uploaded, and no responses to comments provided. Please address all comments made in the previous review dated 08/15/2024 and re-submit.

05/11/2024: Yes. Program Manager recommends CEO endorsement.

### **9.2 Additional Comments to be considered by the Agency during the inception and implementation phase**

##### **Secretariat comment at CEO Endorsement Request**

[Notes to agency]

- please remove yellow highlights in final version,

- please enter agency responses directly under each box in the portal template review sheet, and remove the review sheet responses from Annex I, which is usually reserved for responses to STAP and Council and for GEFSEC comments that were made at PIF stage for consideration at CEO endorsement stage only

### **9.3 Review Dates**



	CEO Approval	Response to Secretariat comments
<b>First Review</b>	<b>7/2/2024</b>	<b>9/24/2024</b>
<b>Additional Review (as necessary)</b>	<b>8/15/2024</b>	<b>11/4/2024</b>
<b>Additional Review (as necessary)</b>	<b>9/20/2024</b>	
<b>Additional Review (as necessary)</b>	<b>11/5/2024</b>	
<b>Additional Review (as necessary)</b>		