The States' Fiscal Transparency, Accountability and Sustainability (SFTAS) Program for Results

2021 Annual Performance Assessment (APA) Report

KATSINA STATE

By:

The Office of the Auditor-General for the Federation as the SFTAS Independent Verification Agent with support from PricewaterhouseCoopers (PwC)

FINAL REPORT

DECEMBER 2022

Table of Contents

1. Executive Summary

This report details the outcome of the Annual Performance Assessment (APA) conducted on Katsina State for the 2021 year of the four-year SFTAS Program. In conducting the APA, the verification team assessed how the State performed against the Disbursement Linked Results (DLRs) listed within the SFTAS DLI Matrix, guidelines, and verification protocol.

Table 1 (below) reflects the outcome of the 2021 APA for Katsina State and shows areas where the State was able to achieve results. In total, Katsina State achieved 9 (Nine) DLRs out of 15 DLRs applicable to the 2021 APA of which 2 (Two) DLRs were achieved in the 2019 and 2020 APAs.

Table 1: Assessment Results

Key:	Achieved	Not Achieved	Previous Achieved

Disbursement Linked Indicators	Disbursement Linked Results	Results	Remarks
DLI 1: Improved financial reporting and budget reliability	DLR 1.1: FY21 quarterly budget implementation reports for Q1, Q2, Q3 and Q4 published on average within 4 weeks of quarter-end to enable timely budget management		The State did not publish the quarterly budget implementation reports timely.
	DLR 1.2: FY21 deviation for total approved original budget expenditure is < 15%		Budget deviation was 49%
DLI 2: Increased openness and citizens' engagement in the budget process	DLR 2.1: Citizens' inputs from formal public consultations are published online, along with the proposed FY2022 budget and citizens' budget based on approved FY21 state budget published online by end April 2021 with functional online feedback mechanisms.	Achieved	
	DLR 2.2: Citizen's Accountability Reports based on audited financial statements /reports are summarized and comprehensible versions of the audited statements and details of State government public consultations with citizens presenting the annual financial statements should be made available on the state official website (s) by 30th September of each subsequent financial year.	Achieved	
DLI 3: Improved cash management and reduced revenue leakages through the implementation of State TSA	DLR 3: TSA, based on a formally approved cash management strategy, established and functional, and covering a minimum of 80 percent of state government finances.		The State TSA did not cover a minimum of 80% of the Government finances.
DLI 4: Strengthened Internally Generated Revenue (IGR) collection	DLR 4.1: State implementing a consolidated state revenue code covering all state IGR sources and stipulating that the state bureau of internal revenue is the sole agency responsible for state revenue collection and accounting. Code must be approved by the state legislature and published	2020	
	DLR 4.2: 2020-2021 annual nominal IGR growth rate meets target -**Basic target**: 20%-39%		The IGR growth rate was 2%

Disbursement Linked Indicators	Disbursement Linked Results	Results	Remarks
	-**Stretch target:** 40% or more		
DLI 5: Biometric registration and Bank Verification Number (BVN) used to reduce payroll fraud	DLR 5.1: Biometric capture of at least 95 percent of current civil servants and pensioners completed and linked to payroll, and identified ghost workers taken off the payroll	🟩	
	DLR 5.2: Link BVN data to at least 95 percent of current civil servants and pensioners on the payroll and payroll fraud addressed	🟩	
DLI 6: Improved procurement practices for increased transparency and value for money	DLR 6.1: Existence of public procurement legal framework and procurement regulatory agency. Said legal framework should conform with the UNCITRAL Model Law and provide for: 1) E-Procurement; 2) Establishment of an independent procurement regulatory agency; and 3) Cover all MDAs receiving funds from the state budget	**2019**	
	6.2 No later than June 30, 2022, implement e-procurement in at least 4 MDAs (incl. Education, Health and Public Works) publish all contract award information in OCDS format on the online portal for the 4 MDAs AND For those MDAs without e-procurement: Publish contract award information above a threshold set out in the State's procurement law/regulation every month in OCDS format on the state website or online portal if available		
DLI 7: Strengthened public debt management and fiscal responsibility framework	DLR 7.1: State implementing state-level debt legislation, which stipulates: 1) responsibilities for contracting state debt; 2) responsibilities for recording/reporting state debt; and 3) fiscal and debt rules/limits.	🟩	
	DLR 7.2: Quarterly state debt reports accepted by the DMO on average two months or less after the end of the quarter in 2021 AND Annual state debt sustainability analysis and Medium-term debt management strategy published by end of December 2021.	🟩	
DLI 8: Improved clearance/reduction of the stock of domestic expenditure arrears	DLR 8: Domestic arrears as of end 2020 and end 2021 reported in an online publicly-accessible database, with verification process in place. AND Percentage decline in the verified stock of domestic arrears at end 2021 compared to end 2020 meets target and is consistent with the state's arrears clearance framework. **Basic target:** At least a 5 percent decline or maintain stock below 5 billion naira **Stretch target:** More than 20 percent decline		The State did not publish online, elements of the Internal domestic arrears database by the year-end.
DLI 9: Improved debt sustainability	Average monthly debt service deduction is < 40% of gross FAAC allocation for FY2021 AND Total debt stock at end of December 2021 as a share of total	**Stretch Target Met**	

Disbursement Linked Indicators	Disbursement Linked Results	Results	Remarks
	revenue for FY2021 meets target: Basic target: < 120%, Stretch target: < 95%.	■	

We further identified several areas where the State can improve its performance, and these are set out in detail within Section 3 of this report. In summary, the State should ensure the following:

1. DLR 1.1: Budget implementation reports are published on the state official website within the due date.
2. DLR 1.2: Expenditure outturn deviation is reduced to a level within the annual limits proposed by the programme.

3. DLR 3.0: Increase the percentage of state government finances flowing through the TSA to eventually ensure that all government finances flow through the TSA.
4. DLR 4.2: Improve its IGR collection to achieve significant year on year growth in nominal IGR.
5. DLR 6.2: Implement e-procurement in all MDAs and publish contract award information in the OCDS format on the online portal for the MDAs.
6. DLR 8: The internal domestic arrears database with relevant balances is placed online through a publicly accessible portal as at year end.

The Office of the Auditor-General for the Federation (OAuGF) as Independent Verification Agent and PricewaterhouseCoopers (PwC) agree on all the results shown in this report.

2. Introduction

2.1 Overview

The Federal Government of Nigeria is implementing a four-year program to support the Nigerian States to strengthen fiscal performance and sustainability: The State Fiscal Transparency, Accountability and Sustainability (SFTAS) Program for Results ("The Program").

The original Programme design had four Key Result Areas and nine disbursement-linked indicators with a financing agreement of US$750 million. Following the advent of COVID-19 in 2020, the Programme was adapted to establish a transparent, accountable, and sustainable fiscal framework to enhance States' fiscal capacity to respond to the Pandemic. The main change brought about in the restructuring was the addition of new COVID-19 responsive DLIs to the Programme and obtaining additional financing of US$750 million to ensure results were sustained across the remaining performance years. This brought the total financing for the SFTAS Programme to US$1.5 billion and increased the DLIs to 13 (thirteen) and the Disbursement Linked Results to 22 (twenty-two). The Program will finance activities under two components: (i) a Program for Results (PforR) component for US$1.45 billion and (ii) a Technical Assistance (TA) component for US$50 million.

All States can participate in the Program in each of the four years and benefit from the PforR funds by meeting set Eligibility Criteria and any or all the indicators of fiscal transparency, accountability, and sustainability.

The Auditor-General for the Federation was appointed as the Independent Verification Agent (IVA) for the SFTAS Programme and PricewaterhouseCoopers (PwC) was subsequently engaged to support the IVA. Both parties have worked together to assess the performance of the State against the Disbursement Linked Results (DLRs) for 2021. To ensure a high-quality assessment, the IVA engaged the Debt Management Office to review the legislation in place at the State.

2.2 Scope

This Annual Performance Assessment (APA) Report covers the State's performance in 2021 against the Disbursement Linked Results (DLRs) listed within the SFTAS DLI Matrix, guidelines, and verification protocol. Each State was earlier assessed against the Eligibility Criteria set in the protocol, to determine the state's eligibility for grants under the 2021 APA.

The verification protocol was set early in the preparation for the Program and all States, implementing agencies and other key stakeholders have been continuously sensitized on the requirements of the program and the protocol for 2021. The assessment results are binary (Pass or Fail), as that is how the Program for Results was designed.

In advance of the performance assessments, all States were provided with the detailed information requirements for the assessments, a proposed itinerary for the assessment visit, and a template with which to report the results achieved. The assessments were conducted between (04/07/2022 and 08/07/2022) with a team of [6 of team members] persons, starting with an opening meeting where all the information requested was to be handed over. The visits were concluded with an exit meeting where initial findings were discussed, and each state was given a further opportunity to provide clarifications and/or additional information.

The draft conclusions from the work done are set out in this Report and the State is expected to revert within five working days with any comments on the results by using the free text box in Section 4.

The Office of the Auditor-General for the Federation (OAuGF) and PricewaterhouseCoopers (PwC) are grateful to the State for the cooperation enjoyed during the assessment and hope the recommendations within this Report are found valuable towards improving fiscal transparency, accountability, and sustainability in the management of the public finances and resources of the State.

3. Assessment Results

3.1 Findings

Table 2: Findings

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
DLI 1: Improved Financial Reporting and Budgeting Reliability				
DLR 1.1	**Financial Year [2021] quarterly budget implementation reports published on average within [4 weeks] of quarter end to enable timely budget management**		**Not Achieved**	
1	Has the State published its quarterly budget implementation report to the State official website on average within four weeks of the end of each quarter?	The Quarterly budget implementation reports were posted online on: Q1- 2021 https://www.katsinastate.gov.ng/wp-content/uploads/2021/04/1ST-QTR-2021-REVISED-CAPITAL-BUDGET-PERFORMANCE.pdf Q2- 2021 https://www.katsinastate.gov.ng/wp-content/uploads/2021/07/2ND-QTR-2021-REVISED-CAPITAL-BUDGET-PERFORMANCE.pdf Q3- 2021 https://www.katsinastate.gov.ng/wp-content/uploads/2021/10/3RD-QTR-2021-REVISED-CAPITAL-BUDGET-PERFORMANCE.pdf Q4- 2021 https://www.katsinastate.gov.ng/wp-content/uploads/2022/01/4TH-QTR-2021-REVISED-	Unsatisfactory	The State should publish the quarterly budget implementation reports timely.

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
		CAPITAL-BUDGET-PERFORMANCE.pdf		
		This was accessed on (05/07/2022).		
		Dates of online publication initially presented by the State are as follows:		
		● Q1 – (28/04/2021) - 4 weeks (28 days)		
		● Q2 – (26/07/2021) - 3.71 weeks (26 days)		
		● Q3 – (22/10/2021) - 3.14 weeks (22 days)		
		● Q4 – (28/01/2022) - 4 weeks (28 days)		
		Average days (26) for the online publication was computed based on the last 4 quarters, as below:		
		28+26+22+28		
		4		
		Average = 26 days (3.7weeks)		
		We downloaded the quarterly budget Implementation Reports for all four quarters for the year 2021, obtained and retained evidence of the timestamp of the publications, as provided by the State.		
		However, IVA subsequently observed that the document properties on the four quarterly reports shows they were published and created on 05/07/2022. Evidence of the timestamp screenshot of the publications has been obtained.		
		The Dates of online publication as seen on the online documents properties are as follows:		
		● Q1 – (05/07/2022) –65.9weeks (461days)		

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
		• Q2 – (05/07/2022) –52.9weeks (370days) • Q3 – (05/07/2022) –39.7weeks (278days) • Q4 – (05/07/2022) - 26.6weeks (186days) $$\frac{461+370+278+186}{4}$$ Average = 323.75 days (46.25weeks)		
2	Do the reports each include, at a minimum, the approved original AND revised (if applicable) budget appropriation for the year against each organizational units (MDAs) for each of the core economic classifications of expenditures (Personnel, Overheads, Capital, and others), the actual expenditures for the quarter attributed to each MDA as well as the actual cumulative expenditures for the year to date, and balances against each of the revenue and expenditure appropriations.	From our review of the Quarterly Budget Implementation reports downloaded from the State's website (see web links above) we observed the following: a) The Budget Implementation Reports included the approved budget appropriation for the year against each organizational unit (MDAs) for each of the core economic classifications of expenditures. b) The Budget Implementation Reports included the actual expenditures for the quarter attributed to each MDA as well as the actual cumulative expenditures for the year to date. c) The Budget Implementation Reports included the balances against each of the revenue and expenditure appropriations. d) The State has no amended/revised budget or passed supplementary budgets. e) The reports included the approved budget appropriation for the year for each of the core economic classifications of expenditures (Personnel, Overheads, Capital, and others); the actual expenditures for the quarter, and the	Satisfactory	

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
		balances against each of the revenue and expenditure appropriations.		
3	Does the report state the actual expenditures for the quarter attributed to each MDA and each expenditure classification as well as the actual cumulative expenditures for the year to date?	The IVA reviewed the State's Budget Performance/implementation reports and confirmed that the report included the actual expenditures for each quarter attributed to each MDA, each expenditure classification, as well as the actual cumulative expenditures for the year to date.	Satisfactory	
4	Does the report state balances against each of the revenue and expenditure appropriations with balances provided on a consolidated basis across the four (4) expenditure classifications and 'Other Expenditures' which will include debt servicing, and transfers, or other expenditures not attributable to any of the other three (3) expenditure classifications?	The State's Budget Performance reports showed the balances against each of the revenue and expenditure appropriations with balances provided on a consolidated basis across the four (4) expenditure classifications and 'Other Expenditures' which includes debt servicing, and transfers, or other expenditures not attributable to any of the other three (3) expenditure classifications.	Satisfactory	
DLR 1.2	FY [2021] deviation from total approved budget expenditure is less than 15%		Not Achieved	
1	Has the State computed the difference between the Original/Approved total budgeted expenditure for the fiscal/calendar year 2021 and	The State computed the budget deviation for 2021 to be 48.57% The IVA computed the budget deviation for this	Unsatisfactory	The State should prepare accurate budgets and reduce the budget deviation to a level below the

Disbursement Linked Indicators (DLIs) and Tests	Findings	Conclusion	Recommendations
the actual total expenditure in the fiscal/calendar year 2021, divided by the Original approved total budgeted expenditure and expressed in positive percentage terms? Is the expenditure outturn deviation computed less than 15%	APA year. See the computation below:		limits set for this result.

	Total Approved Budget (₦)	Actual Outturn (₦)
Capital Exp. (Pages 10 and 11 of AFS & Page 1 of Approved Budget)	₦197,9176,74,318	₦57,348,807,707.13
Rec. Exp. (Pages 10 and 11 of AFS & Page 1 of Approved Budget)	₦88,720,107,025	₦90,078,059,811.21
Total	₦286,637,781,343	₦147,426,867,518.34

$$\frac{₦286,637,781,343 - ₦147,426,867,518.34 \times 100}{₦286,637,781,343}$$

= 48.57%

The budget performance deviation is 49%

Source: 2021 Audited Financial Statement Pg 10 & 11 and Approved Budget and Actual Expenditure or Appropriation Law Pg 1

DLI 2: Increased Openness and Citizens' Engagement

in the Budget Process

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
DLR 2.1	**Citizens' inputs from formal public consultations are published online, along with the proposed FY [2022] budget** **AND** **Citizens' budget based on approved FY21 state budget published online by end April 2021 with functional online feedback mechanisms** <mark> </mark>		**Achieved**	
1	Did the State conduct at least one "town-hall" consultation before the proposed budget is drafted with the participation of local government authorities and State-based CSOs?	a) The LGAs in attendance were Mani, Funtua, Kankia, Katsina, Dutsinma, Malumfashi and Daura. b) The names of the representatives in attendance are: i) Citizens group: Attau Foundation (Bala Rabe), Tama Development Association (Tukur Sule Tama) ii) The CSOs representatives are: Citizens Participation Against Corruption (Bashir Dauda), Advocacy for Social Accountability and Transparency initiative (Bashir Ibrahim Kurfi), Katsina Budget Awareness Initiative (AbdurRahman Abdullahi), Partnership for Child Development (Rabi Muhammad) iii) The CBOs representatives are: Malumfashi Foundation (Sirajo Iliya), Charanchi Local Govt Movement for Devt	Satisfactory	

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
		and Social Justice (Jamilu AbdusSalam), Daura Community Development Association (Rabe Bala Daura), Danmusa Youth Development Forum (Aminu Rabe).		
		c) The IVAs conclusions were drawn from minutes of the meeting, attendance list and pictures.		
		d) The dates of the consultation on the budget proposal were 23rd -26th August 2021 and the consultation was held at conference halls of the old 7 Local Government Area clusters Secretariat.		
		e) A total number of 10 attendees were called to confirm their attendance at the public consultation.		
		f) The budget was drafted on 17th November 2021. The evidence obtained is a copy of the Governor's speech on budget presentation.		
		g) The consultation was held on 23rd -26th August 2021 while the budget was drafted on 17th November 2021. The consultation comes first.		
		h) The date of online publication of the proposed budget was 30th December 2021.		
		i) The proposed budget was published before the deadline of 31 January 2022.		
		j) The web link for the publication of the proposed budget https://www.katsinastate.gov.ng/wp-content/uploads/2021/12/Katsina-State-Government-2022-Proposed-Budget.pdf This was accessed on 05/07/2022		
2	Were the minutes of the	a) The CSO representative in attendance is	Satisfactory	

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
	public consultations jointly prepared with CSO representatives (shown by their signature to the minutes) and posted on the official State website, alongside the proposed annual budget on or before 31 January 2022 to enable citizens to find the inputs easily?	Abdulrahman Abdullahi (Katsina State Budget Awareness Institute). A copy of the signed minutes has been retained on file. b) The title and date of the minutes are Harmonized minutes of meetings of the 34 Local Governments on 2022 citizens' budget held at conference halls of the old 7 local Government area clusters secretariats from 23rd -26th August 2021. c) The CSO representative in attendance is Abdulrahman Abdullahi and the organization he represents is Katsina State Budget Awareness Institute. d) The weblink is https://www.katsinastate.gov.ng/wp-content/uploads/2021/11/2022-Budget-Sensitization-Report.pdf and date of publication 22/11/2021. This was accessed on 05/07/2022. e) The minutes were sign-posted on the website.		
3	Has the State published online, on the State website(s) a *Citizens Budget based on the Approved Budget (2021)* not later than 30 April 2021?	a) The Citizens budget based on the Approved Budget (2021) was published on 28/04/2021 before the due date via https://www.katsinastate.gov.ng/wp-content/uploads/2021/04/2021-Katsina-State-Citizen-Budget.pdf This was accessed on 25/07/2022. b) A comparison of the Approved Budget 2021 with the Citizens Budget was done, and no significant area of discrepancy was identified. c) The Citizen's budget was prepared in the	Satisfactory	

Disbursement Linked Indicators (DLIs) and Tests	Findings	Conclusion	Recommendations

	format suggested to the States in the Citizen Budget User Manual and Excel Template no discrepancies exist among the following:
	
	  i. Simple explanation of the annual approved budget/citizen's budget. (Pgs. 1 and 2)
	
	  ii. The sources of revenues. (Pgs. 4 to 22)
	
	  iii. Sources of domestic and foreign grants, domestic loans, and other financing sources. (Pgs. 12 to 22)
	
	  iv. Total expenditure by economic classifications. (Pg. 23)
	
	  v. The total revenue and grants, total expenditures, budget deficit, budget financing, and financing gap. (Pgs. 3 to 5)
	
	  vi. Disclosure of Budget deficit (if any) and how it will be financed. (Pg. 3)
	
	  vii. Sectoral Allocation (by MDAs). (Pgs. 27 to 31)
	
	  viii. Top Projects to be financed (at least 5). (Pg. 24)
	
	d) The minimum required budget information outlined above (extracted from the Citizen Budget User Manual and Template) has been included.
	
	e) The suggested format was used.		

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
4	Is the Citizens Budget a comprehensible (to citizens) summary of the approved FY21 state budget?	a) The Citizens Budget includes an explanation of the key components in the Approved FY21 Budget. We confirmed that the approved FY21 state budget was summarized in a comprehensible manner to the Citizens in the Citizens budget.	Satisfactory	

5	Does the State website have functional feedback and response online mechanisms?	a) The State has established a functional feedback and response online mechanisms on its website.
		b) The type of feedback mechanism established on the State website is a form requesting name, email, subject, message, also an Email address katsinastatembep@gmail.com has been provided for questions and enquiries.
		c) The State's feedback mechanism provides at a minimum:
		   i. Acknowledgement of receipt of comments/feedbacks from citizens
		   ii. State's responses to comments/feedbacks
		   iii. State's government contact details.
		d) The test conducted by IVA is: an email was sent to katsinastatembep@gmail.com and IVA received feedback, also a form was filled online and submitted, and an acknowledgement message was received and response to the email sent was received.
		e) A demonstration was done by the State Ministry of Budget and Planning to provide further evidence to demonstrate how the State
			Satisfactory	

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
		has responded to feedback submitted online. The results and the evidence of the demonstration provided by the State was a response to the mail sent, a screenshot of the mail sent, and feedback received has been obtained. f) The State's feedback mechanism is functional. g) The weblink is https://www.katsinastate.gov.ng/about-katsina/2022-buget/		
DLR 2.2	Citizen's Accountability Report based on audited financial statements/report published online for FY2020 not later than 30th September 2021.		**Achieved**	
1	Did the State prepare the Citizens Accountability Report to explain the full Annual Audit Report in a summarized form?	a) A copy of the Citizens Accountability Report FY2020 has been downloaded. b) A review was done on the downloaded Citizens Accountability Report. c) The Citizens Accountability Report was published on the deadline of 30th September 2021. A copy has been retained on file. d) The full Annual Audit Report for FY2020 has been compared with the Citizens Accountability Report. No significant area of discrepancy has been identified. e) IVA has obtained and reviewed the evidence of public consultations with Citizens to explain the FY2020 financial statement.	Satisfactory	

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
2	Has the State published a Citizens Accountability Report based on the Annual Financial statements/ Audit Report for FY 2020 not later than 30 September 2021?	a) The Citizens Accountability Report based on the Annual Audit Report (2020) was published before the date on 30/09/2021 via https://www.katsinastate.gov.ng/wp-content/uploads/2021/09/Katsina-State-CAR.pdf This was accessed by IVA on 05/07/2022 b) The Annual Audit Report for FY2020 has been compared with the Citizens Accountability Report. No significant area of discrepancy has been identified. c) The Citizen's Accountability Report was prepared according to the Template provided to the State and no discrepancies exist among the following: i) Simple explanation of the Citizens Accountability Report and Executive Summary. ii) The Budget Outturn. (Pgs. 4 - 6) iii) The Revenue Outturn. (Pgs. 7 -9) iv) The Expenditure Outturn. (Pgs. 10 – 11) v) The Audit Findings. (Pgs. 12 – 13) vi) The Audited Financial Statements. (Pgs. 14 – 15) vii) Top Sectoral Allocations. (Pgs. 16 – 21) viii) Top Value Capital Projects. (Pgs. 22 – 23) ix) Citizens-Nominated Projects-Implementation Status Report. (Pgs. 24 - 25 d) The minimum required citizen's accountability	Satisfactory	

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
		report information outlined above (extracted from the Template) has been included. e) The suggested format was used.		
3	Is the Citizens Accountability Report a comprehensible (to citizens) summary of the FY20 Annual Audit Report?	a) The Citizen's Accountability Report presents in a summarized manner the Audited Financial Statement. b) The Citizens Accountability Report included a concise explanation of the key components of the FY2020 Audited Financial Statements. c) The details of the public consultation report are a summary on what the government plans to achieve in the year and the summary provides simplified information on how taxpayers money will be utilized by the government. The Citizen's Accountability Report for 2020 includes a presentation of the annual financial statements. Copies of the public consultation and Citizen's Accountability Report for 2020 have been obtained and retained on file. We confirmed that the FY20 Annual Audit Report or Audited Financial Statement was summarized in a comprehensible manner to the Citizens in the Citizens Accountability Report. We further confirmed that the CAR was published online by the deadline (30/09/2021) and presented at a public consultation held on 30/08/2021.	Satisfactory	
DLI 3: Improved Cash Management and reduced Revenue Leakages through Implementation of State TSA				
DLR	**Improved cash management**		**Not Achieved**	

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
3.0	**and reduced revenue leakages through the implementation of State TSA**			
1	Has the State established a functional State-level TSA?	a) Katsina State has not established a functional state-level TSA. b) The State operates multiple accounts. The accounts include: ● IGR Main Account: First Bank, Katsina State Board of Internal Revenue Main Account, 2014138384 ● FAAC Account: United Bank for Africa, Katsina State Government Account (TSA), 1019265062 ● VAT Account: Katsina State Government Account, 0597415815 The TSA provider is: United Bank for Africa, Katsina State Government Account, 1019265062.	Unsatisfactory	
2	Is there a formally approved cash management strategy in place? The Strategy should cover the processes through which the State Ministry of Finance or Budgets/Economic Planning can forecast cash commitments and requirements and provide reliable information on the	Katsina State has a cash management strategy: a) The cash management strategy is titled, "Katsina State Government Cash Management Strategy". b) The cash management strategy was produced in August 2020. It was co-signed by the Commissioner of Finance, Honourable Kasim Mutallab and the State Accountant General. c) In Chapters 3 and 4, pg.17-24, the cash management strategy details the processes through which the State Ministry of Finance can	Satisfactory	

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
	availability of funds.	forecast cash commitments and requirements and provide reliable information on the availability of funds. d) The cash management strategy states that cash sweeping is done at 2pm every Friday or at such other earlier time as the State may decide from time to time. e) The cash forecasting plan confirmed that there is evidence of implementation of processes described in the cash management strategy to forecast cash commitments and requirements and provide reliable information on the availability of funds on a monthly basis.		
3	Does the TSA have a system of cash management that allows for a central view of cash balances in bank accounts on a single electronic dashboard (based on the approved cash management strategy)?	Katsina State has an application where cash balances in its bank account can be viewed centrally. a) The name of the application is NIBSS Pay. It was produced by the Nigeria Inter-Bank Settlement System (NIBSS) Plc. b) The application is in line with the approved cash management strategy. c) The application was deployed on Monday, 21 September 2020.	Satisfactory	
4	Does the TSA have one consolidated revenue treasury account for State revenues? Revenues collected by MDAs such as service fees no longer sit in individual MDA accounts at different commercial banks	a) IVA visited the following revenue generating MDAs: Ministries of Health, Education and Works, Housing and Transport. IVA administered questionnaires to DFAs at the respective MDAs. Based on responses received, the MDAs do not have revenue generating bank accounts and therefore do not collect revenues as all revenues are paid into the IGR account,	Satisfactory	

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
	but are brought into the consolidated revenue account as part of the TSA.	where they are swept into the TSA. b) The State TSA is: United Bank for Africa, Katsina State Government Account, 1019265062. c) All government money goes through TSA. d) Government monies do not sit in the other revenue collecting banks. e) The TSA bank statement was obtained.		
5	Does the TSA cover a minimum of 80% of the State Government's finances?	The IVA computed the total cash inflow and outflow from the TSA account against the total government finances inflows and outflows as contained in the Cash flow Statement for the year ended 2021. See the computation below:	Unsatisfactory	The State's TSA should cover all of Government Finances.

	Total Inflows	Total Outflows
TSA Bank Statement	₦100,410,162,337.77	₦95,724,743,179.32
Government Finances*	₦164,499,157,230.08	₦147,426,867,518.34
Percentage	61	65

The average percentage computation is:

$$\frac{61\% + 65\%}{2}$$

$$= 63\%$$

The TSA covered 63 % of the State's finances.

Disbursement Linked Indicators (DLIs) and Tests	Findings	Conclusion	Recommendations
	*Sources: 2021 Audited Financial Statement (Cash flow Statement) Pg.10-11 and the TSA Statement from (United Bank for Africa, Katsina State Government Account, 1019265062) for (January 1- December 31, 2021). IVA checked for spurious transactions in the TSA statement and discovered ₦151,049,550 of inflows and outflows were spurious and therefore IVA deducted this value from both the original inflow and outflow. This is shown below: Original TSA inflow: ₦100,561,211,887.77 - ₦151,049,550 = Final TSA inflow: ₦100,410,162,337.77 Original TSA outflow: ₦95,875,792,729.32 - ₦151,049,550 = Final TSA outflow: ₦95,724,743,179.32. The final TSA inflow and outflow value were used in the computation to determine the result as shown in the table above.		
DLI 4: Strengthened Internally Generated Revenue (IGR) Collection			
DLR 4.1	**State implementing a consolidated state revenue code covering all state IGR sources and stipulating that the state bureau of internal revenue is the sole agency**		**Achieved in 2020 APA**	

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
	responsible for state revenue collection and accounting. Code must be approved by the state legislature and published			
1	Does the State have an up-to-date consolidated revenue code that includes all the State's IGR sources and rates and all the local governments (falling under that State) IGR sources and rates?	**Previously Achieved in 2020 APA**		
2	Does the consolidated revenue code stipulate that the State Bureau of Internal Revenues (SBIR) or the State Internal Revenue Service (SIRS) as the sole agency responsible for State revenue (tax and non-tax) collection and accounting in the State?	**Previously Achieved in 2020 APA**		
3	Is the collection of revenues made into account(s) nominated by the SBIR OR SIRS have full oversight of the accounts and is responsible for reporting and accounting for the revenues?	**Previously Achieved in 2020 APA**		
4	Is the code approved by the	**Previously Achieved in 2020 APA**		

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
	State legislature to have a legal basis, either as a law or a resolution? It cannot be an executive order with no legal basis. The approval shall occur by the 31 December of the year under assessment to count for that year, up to 31 December 2021.			
5	Is the Publication published online, so it is automatically available to the public/all taxpayers?	**Previously Achieved in 2020 APA**		
DLR 4.2	**Annual nominal IGR growth rate meets target**		**Not Achieved**	
1	Has the 2021-2020 annual nominal IGR growth rate met the basic or stretch targets? **Basic Target:** 20% - 39% **Stretch Target:** 40%	a. The State adopted the accrual basis of accounting for revenue reporting in 2020 and 2021 from the Audited Financial Statements b. The IVA computed the annual nominal IGR growth rate for this year APA. See the computation below:	Unsatisfactory	The State should ensure significant year on year improvements in their IGR collection.

REPORTING TEMPLATE: OPTION B	NGN		% GROWTH
Item	2020	2021	

Disbursement Linked Indicators (DLIs) and Tests	Findings				Conclusion	Recommendations
	1. Reported IGR in AFS (Before Adjustments)	15,846,848,947	16,193,813,377	**2%**		
	2. INVALID items to be deducted IF reported as part of IGR	-	-			
	Paris club refund					
	Reimbursements/refunds related to expenditures (e.g., from FGN for Federal roads)					
	Sale of govt property, privatization proceeds					
	Savings					
	Investment Income (e.g. dividends)					
	Interest Earned					
	Miscellaneous					
	3. "Adjusted IGR" for DLI 4.2 Calculation (A OR B)					
	Take reported total IGR and deduct any INVALID items i.e. (1) minus (2)	15,846,848,947	16,193,813,377	**2%**		

₦16,193,813,377 – ₦15,846,848,947 x 100

₦15,846.848.947

=2 %

The annual nominal growth was 2%

Source: 2021 Audited Financial Statement Pg.10

DLI 5: Biometric Registration and Bank Verification Number (BVN) Used to reduce Payroll			

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
Fraud				
DLR 5.1	**Biometric capture of at least [95] percent of current civil servants and pensioners completed and linked to payroll, and identified ghost workers taken off the payroll**		**Achieved**	
1	Has the State used Biometrics to reduce payroll fraud through a completed biometric exercise for 95% of the current civil servants and pensioners on the State payroll?	The State commenced and finished the Biometric data capturing of the civil servant and pensioners from October 2017 through to December 2020 a) It was outsourced to AppMart Integrated Limited. b) The total number of civil servants = 19,895. c) The total number of pensioners = 10,315 d) The total number of civil servants and pensioners on the State Nominal roll and Payroll= 30,210 e) The total number of civil servants and pensioners on the Nominal roll and payroll did not change by 10% or more when compared with the previous year. See the computation below:	Satisfactory	

Total No. of Civil Servants and Pensioners 2020	30,077
Total No. of Civil Servants and Pensioners 2021	30,210

$$\frac{30,210 - 30,077}{30,077} \quad x \quad 100 \quad = \quad 0.44\%$$

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
		f) The total number of biometrics data captured = 30,210. g) The documents obtained for the conclusion is "A report on biometric and BVN from the Katsina state office of the Accountant General" as found in pages 1-4. $$\frac{30,210 \times 100}{30,210} = 100\%$$ The State had captured 100% biometrics of the State's civil servants and pensioners on its payroll.		
2	Has the State linked the biometrics data to the State payroll to identify ghost workers?	a) The State commenced and finished the Biometric data capturing of the civil servant and pensioners from October 2017 through to December 2020. b) The biometrics data that have been linked to the payroll (i.e for staff and pensioners) =30,210. c) There were no ghost workers. d) The in-year changes to the civil servant and pensioner payrolls (as a result of starters, leavers, deaths, etc.) are captured by the biometric exercise. e) There are procedures in place for ensuring timely updates to the payroll to reflect leavers, retirees, and deaths. The document obtained to support IVA conclusion is "A report on biometric and BVN from the Katsina state office of the Accountant General" and "A Variation	Satisfactory	

Disbursement Linked Indicators (DLIs) and Tests	Findings	Conclusion	Recommendations
	Report". As found in pages 1-4.		
	f) There were changes to the civil servant and pensioner payrolls during the fiscal year (as a result of starters, leavers, death).		
	g) The changes were captured during the biometric exercise.		
	h) The system and procedures in place to identify and remove ghost workers is that the system disenables the affected staff, and days of active service starts counting negatively. In essence, view of the payroll software will tell you when a staff retires from the service. Also, in case of death of any staff, the MDA of the deceased staff communicates the death to the office of Accountant General, who then notifies the payroll office, who moved the deceased from his/her MDA to a department called "suspense deceased ''. This department has been configured such that staff in this department are automatically disenabled from receiving in the case of pensioners who are deceased. The family notifies the department of establishment and training, which then takes action to move the deceased pensioner to a department in the software called "dead". This department automatically disenables the pensioner from drawing pension from the State.		
3	Has the State removed confirmed ghost workers and ghost pensioners within three (3) months of each case being confirmed?	a) There were no ghost workers detected. However, a total number of 1,466 staff were removed due to retirement/death during FY2021.	Satisfactory	
		b) The record kept is "A report on biometric and		

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
		BVN from the Katsina state office of the Accountant General" and list of retirees/leavers and death.		
		c) There were no ghost workers identified. However, the leavers/retirees/dead were and identified and removed during the year 2021.		
		d) The total payments before their removal from payroll is ₦31,815,468,847.62		
		e) The total payments after they have been removed is ₦31,652,472,355.32.		
		f) The source of the information is A report on biometric and BVN from Office of the Accountant General (OAG) on Pages 1-4.		
5.2	**Link BVN data to at least** [95**] percent of current civil servants and pensioners on the payroll and payroll fraud addressed**		**Achieved**	
1	Has the State linked the Bank Verification Number data to **95%** of its current Civil Servants and pensioners on the State payroll?	The State commenced and completed the Biometric data capturing of the civil servant and pensioners from October 2017 through to December 2020.	Satisfactory	
		a) It was outsourced to AppMart Integrated Limited.		
		b) The total number of civil servants and number of pensioners is 30,210.		
		c) The total number of civil servants and number of pensioners on the State Nominal roll 30,210.		
		d) The BVN data that were linked to the payroll is 30,210		
		e) The source of the information is "A report on		

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
		biometric and BVN from Office of the Accountant General (OAG)" on Pages 1-4. $\underline{30,210}$ x 100 30,210 =100% The State has linked 100 % of the State's civil servants and pensioners' BVN data to the payroll.		
2	Has the State taken steps to identify payroll fraud?	a) There were no ghost workers. However, a total number of 1,466 staff were removed due to retirement/death during FY2021. b) The record kept is "A report on biometric and BVN from the Katsina state office of the Accountant General" and list of retirees/leavers and death. c) There were no ghost workers identified. However, the leavers/retirees/dead were and identified and removed during the year 2021. d) The total payments before their removal from payroll is ₦31,815,468,847.62 e) The total payments after they have been removed is ₦31,652,472,355.32. f) The source of the information is "report on biometric and BVN" as obtained from Office of the Accountant General (OAG) on Pages 1-4.	Satisfactory	
DLI 6: Improved Procurement Practices for Increased Transparency and Value for Money				
DLR 6.1	**Existence of a public procurement legal framework and a procurement regulatory**		**Previously Achieved In**	

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
	agency. Said legal framework should conform with the UNCITRAL Model Law and provide for: 1) e-Procurement; 2) establishment of an independent procurement regulatory agency and 3) cover all MDAs receiving funds from the State budget		**2019 APA**	
1	Does the State have a public procurement legal framework that must be approved by the State legislature to have a legal basis, either as a law or a resolution?	**Previously Achieved in 2019 APA**		
2	Does the law conform with the UNCITRAL Model Law which should provide for? 1) e-Procurement; 2) establishment of an independent procurement regulatory agency; and 3) cover all MDAs receiving funds from the State budget.	**Previously Achieved in 2019 APA**		

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
3	Has the State instituted an independent procurement regulatory function, which may be performed through one or a combination of the following: bureau, commission, council, agency, or any other type of entity set up for the statutory purpose?	**Previously Achieved in 2019 APA**		
DLR 6.2	**No later than June 30, 2022, implement e-procurement in at least 4 MDAs (incl. Education, Health and Public Works) publish all contract award information in OCDS format on the online portal for the 4 MDAs** **AND** **For those MDAs without e-procurement: Publish contract award information above a threshold set out in the State's procurement law/regulation every month in OCDS format on the state website or online portal if available.**		**Not Achieved**	
1	Has the State achieved open contracting component of the DLI by publishing online, contract award information	a) IVA obtained a schedule of all contracts awarded during the year under assessment. b) IVA checked for the existence of the following: (i) Minimal contracts or no contracts shown for	Satisfactory	

Disbursement Linked Indicators (DLIs) and Tests	Findings	Conclusion	Recommendations
for all contracts awarded during the fiscal year (2021) that are above the threshold (as defined in the State procurement law or the State procurement regulation(s), in line with the Open Contracting Data Standards (OCDS)?	traditionally large spending MDAs, (ii) Minimal/limited awards in some or several months of the year, (iii) No contracts shown for several MDAs in the period, meaning they did not award any contracts, (iv) Variance of the total amount paid to contractors as per the 2021 schedule, to the State's actual capital expenditure. There was a variance of approximately ₦37bn to the State's actual capital expenditure. An APA Issue was raised to that effect. Below is the State's response: "We note your observations, however, please note that the sum of ₦57,348,807,707.13 for capital expenditure in the 2021 AFS represents actual disbursements in 2021 for capital spending. This figure includes even payments for contracts awarded in prior years, while the sum of ₦20,354,964,368.84 for 2021 contract awards published on the state official website represents only contracts awarded in 2021. In fact, some of these contracts may not have been paid in 2021, and therefore not part of ₦57,348,807,707.13. Further, the sum of ₦20,354,964,368.84 also includes not only contracts on capital infrastructure but recurrent and other overheads. Therefore, the figure of actual payments for capital expenditure in 2021 and contracts awarded in 2021 will not necessarily be the same." c) The State published the information on all		

Disbursement Linked Indicators (DLIs) and Tests	Findings	Conclusion	Recommendations
	contracts awarded for the year under assessment. The State does not have a threshold within their Procurement Law. d) The list of contracts published online is complete based on a review against the schedule of all contracts provided. e) The data published is in line with the Open Contracting Data Standards (OCDS). f) The publication was obtained from the State's Procurement page on the State's website. https://www.katsinastate.gov.ng/procurement/ Work done/tests carried out: (i) The IVA requested a schedule of all awarded contracts from the State and compared that with the online publication. There were no differences between the two sets of records. (ii)The schedule was also checked for accuracy and completeness. This was noted to be satisfactory. g) Below is the minimum contract award information that was published: (i) project name, (ii) awarding institution, (iii) award date, (iv) name of contractor, and (v) the contract amount h) None of the items from (g) above was excluded. i) Web link of the publication: https://www.katsinastate.gov.ng/?smd_process_download=1&download_id=2692		

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
		j) The contract award information published on the state official website was accessible to the public.		
2	Has the State implemented e-Procurement in at least 4 MDAs (including Education, Health, and Public Works) by June 30, 2022. The e-Procurement for the **2021** results DLI is the implementation of at least five modules: e-Registration, e-Publishing/Notification, e-Procurement Plan, e-Tendering and e-Evaluation/e-Award	a) The State implemented e-procurement in at least four (4) MDAs (including Education, Health and Public Works) by 30 June 2022. Website: https://portal.ktsbpp.ng/ However, the information on the contracts awarded on the e-procurement platform is not accessible to non-registered visitors. An APA Issue was therefore issued to the State to understand why the information was inaccessible to the public. The State's response is as follows: Katsina State Government operates a very transparent procurement system. The eProcurement solutions require all users/contractors to create accounts on the portal. Further, they are required to upload relevant statutory documents, e.g., certificate of incorporation, memorandum and articles of association, particulars of directors, audited financial statements, tax clearance certificate among others. In line with their chosen functions/expertise, they are expected to pay the prescribed registration fees and upload evidence of payment. These documents are then assessed and approved by relevant officers at the Bureau. It is at this point that contractors can view contract notification, bid and submit documents for same. Therefore, all contracts awarded are then published on the	Unsatisfactory	The State should ensure that the e-procurement is available to the public.

Disbursement Linked Indicators (DLIs) and Tests	Findings	Conclusion	Recommendations
	Portal and accessible by all registered and approved users/contractors.		
	To further demonstrate the State Government openness, all contracts awarded through the eProcurement Portal were/are duly published on the State official website. The link to the published		
	eProcurement contracts awarded had been provided to the IVA during the onsite verification. The link is again stated here; https://www.katsinastate.gov.ng/procurement/		
	b) A report on all transactions for the four MDAs during the period 1 January 2021 to 30 June 2022 directly from the e-procurement systems was obtained.		
	c) A separate report of procurements for all four MDAs for the period 1 January 2022 to 30 June 2022 from the Accountant General was obtained.		
	d) The go-live date for e-procurement at the 4 MDAs was 25th November 2021. There was no back-end evidence for the go-live date. However, the State confirmed the date to the IVA in a signed document.		
	e) For all four MDAs after go-live, a comparison with the system generated report was done. IVA confirmed that all transactions after go-live stated in the Accountant General's report for the period 1 January 2022 to 30 June 2022 were conducted through the e-procurement system.		
	f) A sample of five (5) transactions at random for each of the 4 MDAs was selected and a		

Disbursement Linked Indicators (DLIs) and Tests	Findings	Conclusion	Recommendations
	walkthrough test of the procurement lifecycle was conducted. IVA ensured that contracts with at least 2 categories of expenditure from goods, works or services were selected. g) The selected transactions followed the procurement lifecycle. h) No parts of the transaction were conducted outside of the e-procurement system. i) The e-Registration, e-Publishing/Notification, e-procurement planning, e-Tendering and e-Evaluation/e-Awarding modules have been implemented and transactions were processed through them for the period 1 January 2022 to 30 June 2022. j) The State processed all of its procurement transactions at the 4 MDAs through the five minimum required modules after go-live for the period of 1 January 2022 to 30 June 2022. k) IVA viewed and obtained screenshots of all contracts on the e-procurement portal. Screenshots obtained include advert publishing, bid submission, evaluation and contract award. However, the last check on the State's e-procurement portal prove that the website was inaccessible to the public. In responding to the IVA's request, the State provided the following: "The evidence that the State's eProcurement Portal is accessible to the public can be seen in the link below:		

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
		https://portal.ktsbpp.ng/ https://portal.ktsbpp.ng/contracts		
		IVA checked the website and notes that there is still a requirement for sign in. Although the contracts could be obtained without showing details of the other modules which makes it inadequate to meet the requirements of the veirification protocol.		
DLI 7: Strengthened Public Debt Management and **Fiscal Responsibility Framework**				
DLR 7.1	**State implementing state-level debt legislation, which stipulates: 1) responsibilities for contracting state debt; 2) responsibilities for recording/reporting state debt, and 3) fiscal and debt rules/limits.**		**Achieved**	
1	Is there an Approved state-level public debt legislation through the passage of a State Fiscal Responsibility Law, OR the passage of the State Public Debt Management Law, OR the inclusion of the provisions of the Fiscal Responsibility Act (FRA) in the organic Public Financial Management Law?	a) The State has provided copies of their approved state-level public debt legislation b) Date(s) of approval/assent are 9th June 2017 and amended 8th Sept. 2021	Satisfactory	

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
2	Does the legislation include provisions that establish the following? 1) Responsibilities for contracting state debt; 2) Responsibilities for recording/reporting state debt; and 3) Fiscal and debt rules/limits for the state.	The legislation includes all of the required provisions. a) The results of the team's review of the Debt Management and Fiscal Responsibility Laws. Stating the sections of the code that meet the three required provisions. i. responsibility for contracting state debt is satisfied by section 3 of the FRAL, which introduces a new section 43(3)(c)(I) to the FRL. ii. The responsibility for recording state debt is satisfied by section 3 of the FRAL, which introduces a new section 43(1)(c). Iii. Debt Limits/Fiscal rules are provided in section 44 (1) of the FRL. b) The results of the expert review including all references to sections of the law checked by the expert are: 1.Criterion # 1 is satisfied by s.43(1)(c)(i) of the FRCL introduced by s. 3 of the FRAL. 2.Criterion # 2 is satisfied by s. 46(5) of the FRCL and s.43(1)(c)(ii) &(d) of the FRCL introduced by s. 3 of the FRAL. 3.Criterion #3 is satisfied by ss. 14(3)(d), 15, & 44 (1) of the FRCL and s.43(1)(c)(iii) of the FRCL introduced by s. 3 of the FRAL c) Both conclusions (Team conclusions and expert conclusions) are aligned.	Satisfactory	

Disbursement Linked Indicators (DLIs) and Tests	Findings	Conclusion	Recommendations
	The following are included:		
	Criteria 1: The responsibility for contracting state debt is satisfied by section 3 of the FRAL, which introduces a new section 43(3)(c)(I) to the FRL. The new insertion provides that "the State Governor shall be responsible for contracting debt on behalf of the State "through the Debt Management Department of the State Ministry of Finance".		
	Criteria 2: The responsibility for recording state debt is satisfied by section 46(5) of the FRCL and s.43(1)(c)(ii) &(d) of the FRCL introduced by s. 3 of the FRAL.), which states that the State Government shall, through the Debt Management Department of the State Ministry of Finance be responsible for:		
	for maintaining a reliable database of all loans taken or guaranteed by it, its application, contractual and supplier debts obligations, pension liabilities and other contingent liabilities." The responsibility for reporting state debt is satisfied, section 43(1)(c)(iv), which provides that the Debt Management Department shall also publish the state's budgetary provisions for each fiscal year as it affects its consideration for settling its indebtedness.		
	Criteria 3: Debt Limits/Fiscal rules are provided in section 44 (1) of the FRL, which states that "the Governor shall within 90 days from the commencement of the law, and with advice from		

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
		the Commissioner of Finance subject to approval of the House, set overall limits for the amount of consolidated debt of the State Government subject to the limits and conditions approved by the House, which shall be consistent limits and conditions approved by the House, which shall be consistent with the rules set out in this Law and with the fiscal objectives in the Medium Term Fiscal Framework.		
3	Has the State Debt Management Department (or Unit, Committee, Agency, Board, Bureau, Commission, Council) been operational during the APA year and performing the core function of recording and reporting state debt?	The State Debt Management Department was operational during the APA year and performing the core function of recording and reporting state debt. The work done in line with the Test Programme was to visit the Debt Management Office and interview the Head as well as a staff of the office and review documents, and the evidence(s) obtained are pictures of the office and the questionnaire forms filled by the Head and staff interviewed.	Satisfactory	
DLR 7.2	**Quarterly state debt reports accepted by the DMO on average two months or less after the end of the quarter in 2021** **AND** **Annual state debt sustainability analysis and Medium-term debt management strategy published by end of December 2021**		**Achieved**	

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
1	Has the State produced quarterly State Domestic Debt Reports (SDDR), which are approved by the DMO on average two months after the end of the quarter in 2021?	a) The state submitted quarterly State Domestic Debt Reports (SDDR) (final versions) to the DMO on an average of **2** months after the end of each quarter. We obtained evidence that the State produced approved quarterly SDDRs, which were submitted and received by the DMO as follows: ● Q1 submitted on (14/05/2021)44 days, ● Q2 submitted on (16/08/2021)47 days, ● Q3 submitted on (12/11/2021)43 days and ● Q4 submitted on (17/02/2022)48 days. **44+47+43+48** 4 Average = 45.50 days (6.5 weeks) The SDDRs were submitted within an average of 1.625 months (Average number of 45.50 days days).	Satisfactory	
2	**Note: Have you reviewed for accuracy and completeness from the DMO:** The State Domestic and External Debt Report (SDEDR) along with all underlying data and supporting documents including the DMO templates	a) The Quarterly State Domestic Debt Reports (SDDR) from the Federal DMO, CBN, and FMOF, along with all underlying data and supporting documents were obtained. b) The State Domestic and External Debt Report (SDEDR) from the Federal DMO, CBN, and FMOF, along with all underlying data has been compared with the supporting documents.	N/A	

Disbursement Linked Indicators (DLIs) and Tests	Findings	Conclusion	Recommendations

and guidelines and standard internal protocols and data from CBN, DMO, and FMOF Home Finance used by the
 	
DMO to cross-check the state's domestic debt figures.
	IVA reviewed the DMO's Report on State Domestic and External Debt Report (SDEDR) with the Katsina State Debt Domestic Report along with all underlying data. The report was supported with the DMO's templates and guidelines.
	
	We reviewed the DMO report and the DMO report confirmed the <u>accuracy</u> and <u>completeness</u> of the State Domestic Debt Report.
	
	c) The Quarterly State Domestic Debt Reports (SDDR) submitted by the State has been compared with the State Audited Financial Statement.
	
	d) The debt stock figures reported in the SDDR has been compared with that of the State's Audited Financial Statement
	
	e) There were any discrepancies noted during the comparison.
	   i. SDDR Figure: ₦66,675,639,486.81
	   ii. AFS Figure: ₦63,522,249,748.06
	   iii. Difference: ₦3,153,389,739.
	
	f) IVA communicated to the State to provide clarification as regards the discrepancies. The State responded thus: The difference in total pension and gratuity amount in the sum of ₦3,153,389,738.73 between the State Domestic Debt Reports (SDDR) and the Audited		

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
		Financial Statements (AFS) is because of payments of arrears of pension and gratuity paid in 2021 were not captured in the SDDR as of February 2022 when the report (SDDR) was being finalized for submission to the Federal Debt Management Office, Abuja. However, the 2021 AFS captured some pension and gratuity arrears settled in 2021. g) The State Domestic and External Debt Report (SDEDR) from the Federal DMO has been compared with the Quarterly State Domestic Debt Reports (SDDR) submitted by the State.		
3	Has the State published online the State Debt Sustainability Analysis and Debt Management Strategy Report (SDSA-DMSR) by 31 December 2021?	a) The State Debt Sustainability Analysis and Debt Management Strategy Report (SDSA-DMSR) was published on the State official website. b) The date of publication was 24 Dec 2021. c) The State Debt Sustainability Analysis and Debt Management Strategy Report (SDSA-DMSR) was published by 31 December 2021.The evidence obtained to confirm the date of online publication was the screenshot of the back end. d) The web link - https://www.katsinastate.gov.ng/wp-content/uploads/2021/12/Katsina-State-2021-DSA-DMS-Report.pdf	Satisfactory	
4	Does the SDSA - DMSR include the following: 1) medium-term budget forecasts; 2) detailed and adequate description of the debt portfolio and	Upon review of the SDSA -DMSR, it included the following: (1) Adequate presentation of medium-term budget forecasts, including: (a) Presentation of MTB forecasts in either a	Satisfactory	

Disbursement Linked Indicators (DLIs) and Tests	Findings	Conclusion	Recommendations
borrowing options; including a summary analysis of the projections of performance indicators used to assess Debt Management Strategy, and their implications for cost-risk profile of State debt portfolio in 2025; and 3) adequate analysis of the debt and fiscal figures in the preceding calendar year?	table OR chart(s) (OR both table and chart(s)) with projected annual figures from 2021 to 2024. (b) Description of assumptions underpinning the MTB forecasts from 2021 to 2024: either a table with assumptions OR corresponding explanations in writing (OR both) (c) A summary analysis of MTB forecasts and their implications for fiscal and debt policies throughout the period 2021-2024 (d) The presentation and analysis in the entire forecast period need to be of adequate quality, and do not contain illogical statements (e.g. negative figures for debt stock; contradictory or illogical statements or arguments, etc.) (2) A detailed and adequate description of the debt portfolio and borrowing options, including: (a) Presentation of debt and borrowing projections in the baseline scenario either using a table OR charts (OR both) with projected figures from 2021 to 2030. (b) Description of assumptions underpinning the borrowing options presented: either a table with assumptions OR corresponding explanations in writing (OR both) (c) A summary analysis of the debt projections and their implications for debt sustainability and fiscal policies throughout the period 2021-2030		

Disbursement Linked Indicators (DLIs) and Tests	Findings	Conclusion	Recommendations

	(d) A summary analysis of the projections of performance indicators used to assess DMS throughout the period 2021-2025, and their implications for the cost-risk profile of the State debt portfolio in 2025.
	
	(e) The presentation and analysis in the entire forecast period need to be of adequate quality, and do not contain illogical statements (e.g. negative figures for debt and borrowing projections; contradictory or illogical statements or arguments, etc.)
	
	(3) Adequate presentation and analysis of the debt and fiscal figures position in the preceding calendar year, which contains the following;
	
	    (a) Presentation of revenue, expenditure, budget balance, and debt information, at least for 2020: either a table OR charts (OR both table and chart(s)) with historical figures for at least 2020
	
	    (b) A summary analysis of the information presented on revenue, expenditure, budget balance, and debt in 2020: analysis (in writing) of fiscal and debt situation in 2020.
	
	    (c) The presentation and analysis in the entire historical period need to be of adequate quality, and do not contain illogical statements (e.g. negative figures for debt and borrowing projections; contradictory or illogical statements or arguments, etc.)
	
	b) A review and comparison between the information (figures) contained in the assessment report of the SDSA-DMSR obtained		

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
		from the DMO and the SDSA-DMSR obtained from the State Website was done. There were no differences identified		
DLI 8: Improved Clearance/Reduction of Stock of *Domestic Expenditure Arrears*				
DLR 8.0	**Domestic arrears as of end 2020 and end 2021 reported in an online publicly accessible database, with verification process in place.** **AND** **Percentage decline in the verified stock of domestic arrears at end 2021 compared to end 2020 meets target and is consistent with the state's arrears clearance framework.** **Basic Target: At least a 5 percent decline or maintain stock below 5 billion naira** **Stretch Target: More than 20 percent decline**		**Not Achieved**	
1	Has the State established an Arrears Clearance Framework (ACF)?	a) The State has established an Arrears Clearance Framework (ACF). b) IVA has obtained a copy of the ACF from the State.	Satisfactory	

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
		c) The establishment of the ACF occurred by 15th September 2020. d) The duration of time between the establishment of the ACF 15th September 2020 and the 31 December 2021 year-end, is adequate to allow time for the implementation of the ACF.		
2	Does the ACF contain: 1) the planned actions to settle arrears; and 2) an explicit prioritization of expenditure arrears to be settled.	a) The ACF contains planned actions to settle arrears and an explicit prioritization of expenditure arrears to be settled. b) The evidence to show that ACF contains the two stated requirements are on page 8 of the ACF for the Planned actions to settle the arrears and pages 21-22 for the explicit prioritization of the expenditure arrears to be settled. c) The documents submitted by the state to confirm the ACF exists is the hard copy of the ACF and a screenshot of the backend where it was published. A copy of the ACF was also downloaded.	Satisfactory	
3	Has the ACF been published on a State official website?	a) IVA has confirmed that the ACF has been published on a State official website b) IVA has downloaded a copy for validation. c) The weblink - https://www.katsinastate.gov.ng/wp-content/uploads/2020/12/KATSINA-STATE-ACF.docx Evidence obtained to confirm the date of publication is the Screenshot of the backend.	Satisfactory	
4.	Is the clearance of domestic expenditure arrears consistent	The clearance of domestic expenditure arrears is consistent with the ACF.	Satisfactory	

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
	with the ACF, once the ACF has been established?	A walkthrough test on the internal domestic arrears database showed that the contractors and pension and gratuity arrears is being paid based on the ACF i.e the ongoing completed work (construction), largest value (outstanding arrears) and smallest value (outstanding arrears), oldest (date missed payment was due) respectively.		

5.	Has the State established an Internal Domestic Arrears Database?	a) The State has established an Internal Domestic Arrears Database
		
		b) The Internal Domestic Arrears Database includes the following:
		
		  a. The aggregate and individual amounts of contractors' arrears. For contractors' arrears, the internal domestic arrears database also included the name of the contractor, the amount due at the end-of-year, the nature of the goods and services procured that generated the claim, and billing data. The database showed the total domestic arrears stock at the end of each year.
		
		  b. The aggregate amount of pension and gratuity arrears.
		
		  c. The aggregate amount of salary arrears and other staff claims. NIL
		
		  d. The aggregate amount of other types of domestic arrears. NIL
		
		c) A verification process is in place for the arrears in the database.
		
		d) IVA confirmed through the evidence provided by the State that the State has conducted
			Satisfactory	

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
		verification of arrears balances.		
		e) IVA conducted tests to ascertain the accuracy of the figure in the internal domestic arrears database, including cross-checking with State account balances, payroll records, underlying contract data.		
		f) The state submitted to the IVA the annual state arrears recording, verification, and clearance report (SARVCR).		
6	Has the State published online elements of the internal domestic arrears database for the FY **2020** and FY **2021** reported on a State official website, which constitutes the online publicly accessible arrears database?	a) The State has published online the required elements of the Internal Domestic Arrears Database as at the end of 2020. However, the arrears for 2021 was published on 20th June 2022.	Unsatisfactory	The State should ensure they publish online, elements of the Internal domestic arrears database by the year end.
		b) IVA compared the aggregate and individual information available on the online publicly accessible arrears database with the information in the internal domestic arrears database and verified the consistency and accuracy of the information on the online publicly accessible arrears database.		
		c) The website supporting the online publicly accessible arrears database contains an electronic link that permits any potential contractor creditor whose individual claim is not listed in the database to communicate this exclusion to the State Ministry of Finance, by filling a confidential form online and attaching supportive evidence of her claim. No claims were made, so the State Ministry of Finance could not confirm the validity of any claim, to be added to the internal domestic arrears		

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
		database and included as relevant in the online publicly accessible arrears database.		
		d) IVA confirmed that the online web pages include a facility for contractors with arrears (creditors) to report any omissions to the State.		
		e) The result of the test of the facility for contractors with arrears (creditors) to report any omissions to the State is an email sent to ' katsinadmo@gmail.com' and an acknowledgement message was received.		
		f) There were no omissions reported by contractors.		
		g) There were no omissions reported by contractors so IVA did not obtain records from the State on reported omissions and how they were treated.		
		h) There were no omissions reported by contractors so IVA did not make further confirmation on if any omissions reported by the State were found to be valid and subsequently included in the internal domestic arrears database.		
		i) The source of information is: https://www.katsinastate.gov.ng/wp-content/uploads/2021/12/2021-Internal-Domestic-Arrears-Database.pdf https://www.katsinastate.gov.ng/about-katsina/2021-debt-management/ The publication on this website was dated 20th June 2022, which was after the deadline which		

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
		is considered unsatisfactory		
		The findings and conclusions of IVA are:		
		IVA downloaded and retained a copy of the Internal Domestic Arrears Database from the State website, also IVA sent an email to ' katsinadmo@gmail.com' to test the functionality of the feedback online mechanism for contractors with arrears to report any omissions, and a response was received via email. A copy is saved and retained on file.		
7.	Does the online publication include? 1) the aggregate amount of contractors' arrears; 2) the aggregate amount of pension and gratuity arrears; 3) the aggregate amount of salary arrears and other staff claims; 4) other types of domestic arrears and 5) a list of names of contractors with recognized arrears exceeding ₦20 million and information for contractors to be able to verify that their claims are being accurately reported in	The online publication includes the aggregate amount for two types out of the four types of arrears as shown - The aggregate and individual amounts of contractors' arrears ₦6,861,149,779.50 - The aggregate amount of pension and gratuity arrears ₦6,866,407,175.12 - The aggregate amount of salary arrears and other staff claims. NIL - The aggregate amount of other types of domestic arrears NIL The online publication contains the names of contractors owed ₦20m in arrears and above. The weblinks to the online publications are: https://www.katsinastate.gov.ng/wp-content/uploads/2021/12/2021-Contractors-Arrears-Database.pdf3	Satisfactory	

Disbursement Linked Indicators (DLIs) and Tests		Findings	Conclusion	Recommendations
	the database.	https://www.katsinastate.gov.ng/about-katsina/2021-debt-management/		
8.	Has the State met the following? (i) Percentage decline in the verified stock of domestic arrears at end 2021 compared to end 2020 meets target and is consistent with the state's arrears clearance framework. **Basic target**: At least a 5 percent decline or maintain stock below 5 billion naira **Stretch target**: More than 20 percent decline *The clearance/reduction of domestic expenditure arrears (contractors, pension and gratuity arrears, salary arrears, and other staff claims) is defined as the decline in the nominal stock of total domestic expenditure arrears at the end of the year, compared to the previous year, expressed in percentage*	(see table and calculation below)	Satisfactory	

Table within Findings:

Aggregate Amount of:	2021	2020	% diff.
Contractors Arrears	₦6,861,149,779.50	₦16,568,569,225.84	-58.59
Pension and Gratuity arrears	₦6,866,407,175.1	₦2,482,811,826.56	176.56
Salary arrears and Staff claims			
Judgment Debt			
Other types of domestic expenditure arrears			
Total Domestic Arrears	₦13,727,556,954.6	₦19,051,381,052.4	-27.94

$$\frac{₦19,051,381,052.4 - ₦13,727,556,954.6}{₦19,051,381,052.40} \times 100$$

$$= 27.94\%$$

The percentage decline is 27.94%

a. We obtained the Domestic arrears figure from the State Internal Domestic Arrears (SIDA)

Disbursement Linked Indicators (DLIs) and Tests	Findings	Conclusion	Recommendations
terms.	database, and confirmed it was the same as the balances stated in the SDDR but different from the AFS for 2021. *SIDA -* ₦13,727,556,954.6 SDDR - ₦13,727,556,954.6 AFS - ₦10,574,167,215.87 IVA sent an APA issue report to the State and they responded thus: "The difference in total pension and gratuity amount in the sum of ₦3,153,389,738.73 between the State Domestic Debt Reports (SDDR) and the Audited Financial Statements (AFS) is because of payments of arrears of pension and gratuity paid in 2021 were not captured in the SDDR as of February 2022 when the report (SDDR) was being finalized for submission to the Federal Debt Management Office, Abuja. However, the 2021 AFS captured some pension and gratuity arrears settled in 2021." IVA was satisfied with the State response. Furthermore, IVA also reviewed the reduction in contractor's arrears amounting to ₦9,707,419,446.34 during the year and obtained a schedule of paid arrears and some payment vouchers as evidence of payments made during the year. This has been retained in file. **Source**: State internal domestic expenditure arrears		

Disbursement Linked Indicators (DLIs) and Tests		Findings		Conclusion	Recommendations
		database			
DLI 9: Improved Debt Sustainability					
DLR 9.0	**Average monthly debt service deduction is < 40% of gross FAAC allocation for FY2021** **AND** **Total debt stock at end of December 2021 as a share of total revenue for FY 2021 meets target:** **-Basic target: < 120%** **-Stretch target: < 95%**			**Achieved** (Stretch Target Met)	
1	Has the State met: (i) the ratio of total debt stock at end-of-year (31st December 2021) of the year of assessment to the total revenue collected during the calendar year of the year of assessment (1st January to 31st December 2021)? **-Basic target:< [120%]** **-Stretch target: < [95%]** (ii) Average monthly debt service deduction is < 40% of gross FAAC allocation for FY2021.	The following tables show the calculations and adjustments made to arrive at the appropriate figures for this comparison. **Total Public Debt*** 		Financial Statements	DMO/ SDEDR Figures
---	---	---
Total Domestic Debts	₦63,522,249,748.06	₦79,407,342,715.08
Total External Debts	₦24,782,412,696.16	₦24,782,412,695.97
Total Public Debts	₦88,304,662,444.22	₦104,189,755,411.05		Satisfactory	

Disbursement Linked Indicators (DLIs) and Tests	Findings	Conclusion	Recommendations
	Total annual revenue 	2021 Adjusted IGR (see DLI 4.2)	₦16,193,813,377
Gross FAAC Allocation**	₦78,457,312,868
Grants	₦16,832,105,139
Other Revenues	₦75,547,611.65
Total Revenue	₦111,558,778,996. | a. We have computed the total debts stock / Revenue percentage for the 2021 year, as follows: DMO Computation ₦104,189,755,411.05 x 100 ₦111,558,778,996 = 93.39% AFS Computation ₦88,304,662,444.22 x 100 ₦111,558,778,996 =79.15% We have computed the total debt service deduction / Gross FAAC Allocation percentage for the 2021 year, as follows: ₦9,081,986,311 x 100 ₦78,457,312,868 =11.57% b. The required comparison between the State Debt records with the SDEDR from Federal DMO		

Disbursement Linked Indicators (DLIs) and Tests	Findings	Conclusion	Recommendations
	has been done. ***Sources:*** i. For Total Revenue 2021 Audited Financial Statement, Page 10-11 ii. *For Total Public Debt from DMO* as at December 31, 2021* iii. *NBS/OAGF (FAAC)* **Table 3(i) below holds a breakdown of the Total Debt.* *** Refer to the FAAC table on DLI9 provided.*		

TABLE 3(i): DLI 9 31 DECEMBER 2021 STATE DEBT STOCK TABLES FOR KATSINA STATE

S/N	KATSINA STATE	2021 - AMOUNT (₦)
1	BUDGET SUPPORT LOAN (SOURCE FMOF)	22,021,729,672.49
2	BAIL OUT (SALARIES) (SOURCE CBN)	10,636,558,683.90
3	RESTRUCTURED COMMERCIAL BANK LOANS (FGN BOND)	-
4	EXCESS CRUDE ACCOUNT BACKED LOAN (SOURCE CBN)	8,726,501,124.03
5	STATE BONDS	18,754,331,927.50
6	COMMERCIAL BANK LOANS	-

S/N	KATSINA STATE	2021 - AMOUNT (₦)
7	CBN COMMERCIAL AGRIC LOAN (SOURCE CBN)	-
8	ACCELERATED AGRIC DEVELOPMENT SCHEME LOAN	-
9	BAIL-OUT (INFRASTRUCTURE)	-
10	CBN DIFFERENTIATED CASH RESERVE REQ LOAN	-
11	HEALTHCARE DEDUCTIONS	-
12	BRIDGE FINANCE FACILITY	3,053,241,757.40
13	FAMILY HOMES FUND	-
14	ANCHOR BORROWERS PROGRAMME	1,411,811,228.83
15	OTHER FGN INTERVENTIONS	-
16	MICRO SMALL MEDIUM ENTERPRISE DEVELOPMENT FUND (MSMEDF)	1,075,611,366.32
17	JUDGEMENT DEBTS	-
18	GOVT - GOVT DEBTS	-
19	CONTRACTORS' ARREARS	6,861,149,779.50
20	PENSION AND GRATUITY ARREARS	6,866,407,175.12
21	SALARY ARREARS AND OTHER CLAIMS	-
22	OTHER DEBTS	-
	TOTAL DOMESTIC DEBT (TDD)	**79,407,342,715.08**
	TOTAL EXTERNAL DEBT (TED)	**24,782,412,695.97**
	TOTAL PUBLIC DEBT (TED+TDD)	**104,189,755,411.05**

TABLE 3(ii): DLI 9 31 DECEMBER 2021 - ADJUSTED REVENUE TABLES FOR KATSINA STATE

TEMPLATE: OPTION A	NGN
Item	2021
1. Total Gross FAAC allocation: Statutory Transfers and VAT (1.1 + 1.2)	78,457,312,868
1.1 Statutory transfers (1.1.1 + 1.1.2 + 1.1.3)	51,914,563,459
1.1.1 Gross statutory allocation	43,396,265,593
1.1.2 Derivation	
1.1.3 Other FAAC transfers (also known as Distribution) such as excess PPT savings account, Forex equalization, excess bank charges, exchange rate gain, augmentation, others	8,518,297,866
1.2 VAT	26,542,749,409
2. Internally Generated Revenues (IGR) – Adjusted	16,193,813,377
3. Grants (internal and external)	16,832,105,139
4A. Other revenues (4.1 + 4.2 + 4.3)	75,547,612
4.1 Investment Income (e.g. dividends)	75,547,612
4.2 Interest Earned	
4.3 Miscellaneous	
Total Revenues and Grants Calculations	
A) Total Revenues and Grants is (1+2+3+4A)	111,558,778,996

4.   **Response from the State**

The State should please use the table below for their response.

S/N	State Response to the draft report	IVA Follow-up, response, treatment
1	DLR 1.1 We hereby disagree that Katsina State published the quarterly budget implementation reports on 5th July 2022. As you would know, the Nigeria Governors' Forum (NGF) is the Technical Partner to the SFTAS program and provides technical support to States of the Federation on budget implementation reports among others. These reports are usually sent to the NGF on a quarterly basis for their inputs before they are uploaded. Therefore, it is practically impossible for Katsina State to publish these reports on the stated dates because we took advantage of the technical support being provided by the NGF, sent draft reports to NGF and uploaded before various deadlines. We published all quarterly budget implementation reports before deadlines and in line with the Verification Protocol (VP). Server evidence of these reports were duly provided (on 4th July, 2022) to the IVA during the field work. We hereby attach the server evidence again (Appendix 1). Furthermore, if the correct screenshots for the document properties for these reports were taken, then they should tally with the server evidence. Screenshots of the document properties are hereby attached and marked "Appendix 2".	IVA notes the State's response. However, the document properties showed that the document was created on the dates presented in the reports and thus, IVA's findings remains.
2	DLR 6.2 The evidence that the State's eProcurement Portal is accessible to the public can be seen in the link below: https://portal.ktsbpp.ng/; https://portal.ktsbpp.ng/contracts.	IVA notes the State's response and has included it in the report. However, the Portal still requires sign in details and when IVA tried to "Create" an account to be able to check the e-procurement environment, it indicated email has been sent for verification, which never came and thus could not access the portal. The issue raised was not addressed and thus the e-procurement is not accessible to the public.
3	DLI 8 Katsina State 2021 Internal Domestic Arrears Database was not published on the 20th June, 2022. The report was	IVA reviewed the Document Properties of the Internal Domestic Arrears Database and it showed

	published on 29th December, 2021 at about 07:58 PM. The backend evidence was duly provided to the IVA during the field work. Furthermore, it is inconceivable that all Katsina State 2021 debt management documents were published before the deadlines save the Internal Domestic Arrears Database. All (without exception) required Katsina State debt management documents were published before or by the deadlines as required by the VP. The State is alarmed that the backend evidence provided to the IVA during the field work was never considered in arriving at the conclusion. We hereby attached backend evidence (Appendix 3) provided to the IVA on 4th July, 2022. The screenshot of the document properties (Appendix 4) for your guidance and further necessary action please.	that the document was created in 2022 and so, could not possibly have been published online in 2021. IVA's findings remain valid.
4		